

## Privacy Policy

Last modified: 09.06.2021

**Please read this Privacy Policy (“Privacy Policy”) carefully as it will constitute a binding contract between you and Averia Electronics, Inc. (“Company,” “we” or “us”). By visiting our website (www.averia.com), downloading and/or using our mobile applications, registering for or using our service through our applications or website (collectively, our “Service”), or by checking an opt-in box we provide in our mobile applications or on our website, you agree to be bound by this Privacy Policy and our Terms of Use (“Terms of Use”) (available at the following URL: [https://averia.com/policy/en/privacy\\_policy.pdf](https://averia.com/policy/en/privacy_policy.pdf)), which are incorporated herein by reference. This Privacy Policy and our Terms of Use govern your access to and use of our Service, including any content, functionality, and services offered on or through the Service, whether you are a guest or a registered user. If you do not agree with this Privacy Policy or our Terms of Use, you must not use or access our Service.**

**This Policy describes the information we collect from you or that you may provide to us when you use our Service or website and our practices for collecting, using, maintaining, protecting, and disclosing that information.**

### **Information We Collect About You and How We Collect It**

Information we collect about you when you use our Service can be: (i) Personal Information; or (ii) Anonymous Information. “Personal Information” is any information that could reasonably be used to identify you, and “Anonymous Information” is information that cannot be used to identify you personally such as data concerning the time spent on a particular page of our website.

We may collect Personal Information about you in the ways described below. Please be advised that if you do not provide certain Personal Information to us when requested, you may not be able to register or use our Service if that information is necessary for that purpose or if we are legally required to collect that information.

### **Information You Provide to Us**

When you register to become a user of our Service, you will need to provide Personal Information, which includes, for example, your: (i) first and last names; (ii) e-mail address; (iii) phone numbers (landline or mobile); (iv) the name and/or SSID (Service Set Identifier) number of your WiFi network; and (viii) geographic location when you create “Safe Zones” using our Service.

You will voluntarily provide us with your Personal Information when you register to establish an account through our Service; when you complete any online forms available in our mobile applications or website, which can include submitting information about your pet, your WiFi information, or payment information for signing up for a subscription service; and when you create a Safe Zone using our Service, which will involve your selection of points on a map to create a geofenced area which could identify your location.

If you choose to create an account with our Service through a single sign on using third party services such as Facebook, Google, Amazon, or Apple, Personal Information collected about you may include information about you that you provided to those service such as: (i) User ID; (ii) name; (iii) your avatar; (iv) email address; (v) Facebook page URL; and (vi) last update.

You may also provide us with Personal Information other ways such as when you send us an e-mail, post any content in our mobile applications or on our website, submit information or answers through comment forms on either, or send messages to other users on our website or Service.

#### *Information We Collect Through Automatic Data Collection Technologies*

In addition to information you provide to us voluntarily, as you use our Service we may use automatic data collection technologies to collect certain information about you which can include both Personal Information and Anonymous Information. For example, as noted above, geolocation information about where you or your pet is located can be collected automatically as well as from where our mobile applications are being used which could all identify your location or address. Our mobile applications could also be used with BLE beacons (Bluetooth low-energy beacons), which could identify your physical address as well.

We also automatically collect Anonymous Information about you which primarily consists of data and information about your interaction with our Service. This data and information may be collected by a technology called “cookies” and can include Anonymous Information about things such as: (i) the frequency of your visits to our website or uses of our mobile applications; (ii) the pages or screens viewed or clicked by you; (iii) the time you spent on any webpage or application screen; (iv) clickstream data; or (v) information about your device (e.g., whether it is a desktop computer or mobile device), the operating system you are using, and your browser type.

#### *Our Cookies Policy*

By using our website and Service, you consent to our use of automatic data collection and tracking technologies as described in this Privacy Policy. The types of technologies we may use include cookies and Google Analytics. A cookie is a small text file placed on the hard drive of your computer or mobile device by our website or mobile applications or a third-party service or website like Google Analytics. In addition to our uses of cookies described above, we also use cookies to: (i) track our users’ visits and source; (ii) track webpages viewed; (iii) store user preferences such as preferred language (if applicable); (iv) gather statistics on the number of users, the location of users, and usage habits or patterns; (v) tailor users’ website experience or product advertisements for each user; or (vi) or analyze parts of our website or Service in order to improve its speed, functionality, or performance.

You can choose to not accept or delete (“flush”) cookies by adjusting your web browser settings. However, if you do so, you may be unable to access certain parts of our website or Service or lose some of the functionality of our Service. Unless you have set your browser not to accept cookies, our system and Service will issue cookies when you direct your browser to our website or use our mobile applications.

Opting-Out and Managing Cookies: When you visit our website or use our Service through a web browser or mobile device, you can change the settings in your browser or device to alter the cookie preferences, including not accepting cookies. We have provided links below to further information on how to manage cookies depending on the browser or device you use.

Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Mozilla Firefox:

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Microsoft Internet Explorer:

<https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Mobile Devices: If you access our website or Service through a mobile device or our mobile applications, you can learn more about changing your cookie preferences by visiting the following link corresponding to your mobile operating system:

Android:

<https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DAndroid&hl=en>

Apple iOS:

<https://support.apple.com/en-us/HT201265>

Google Analytics: We use Google Analytics, a web analytics service provided by Google Inc. (“Google”), which uses cookies to help analyze the use of our website and mobile applications. The information generated by cookies about your use of our website and applications will be anonymous, but may be sent to Google and stored by Google. Google will use this information to evaluate your use of our website and applications, compile reports on activity on both, and provide us with other Internet-related services. Also, Google may transfer this information to third parties if required by law or if third parties process the information on Google’s behalf. By using our website and Service, you consent to the processing of data about you by Google in the manner described and for the aforementioned purpose. More information about Google Analytics can be found at the following URLs:

[https://marketingplatform.google.com/about/analytics/#?modal\\_active=none](https://marketingplatform.google.com/about/analytics/#?modal_active=none)

You can also choose to opt-out of Google Analytics if you wish. To learn more about this, you may visit the following link: <https://tools.google.com/dlpage/gaoptout>

Third-Party Use of Cookies and Other Tracking Technologies: Some content or applications on our website or Service may be served by third-parties. These third parties may use cookies alone or together with other tracking technologies to collect information about you when you use our website or Service. The information they collect may be associated with your Personal Information or they may collect information about your online activities over time and across different websites and other online services. By using our website or Service you consent to these third parties’ use of cookies, but please note that we

do not control these third parties' tracking technologies or how they may be used. If you have any questions about them, you should contact the responsible provider directly.

### **How We Use Information We Collect**

We use information we collect about you or that you provide to us, including Personal Information:

- To allow you to purchase our products and sign up for subscriptions in our Service;
- To ship products to you that you have ordered from us, or to fulfill product and Service requests;
- To allow you to create an account with our Service;
- To present our website and Service and their respective content and features to you, including personalizing your experience on our website or Service;
- To market products and services to users;
- To analyze data to send more targeted messages to visitors;
- To conduct research and analyze data to better understand user behavior when using our Service in order for us to improve our website, products, and Service;
- To enable vendors and contractors to assist with marketing, operation, troubleshooting and analysis of our website;
- To deliver email messages like special offers, updates, newsletters, customer service, and Services announcements;
- To recommend new content or other goods or services that may be of interest to you;
- To verify your identity and process transactions you participate in, including allowing us to process payments;
- To respond to your inquiries, and send you transaction-related emails or service notifications;
- To provide you with notices about your account or registration;
- To protect our website and Service, including protecting your and other users' accounts;
- Enforce our Terms of Use, our legal rights, and to comply with applicable law, a subpoena, or other legal process, or to protect against liability and when we believe in good faith that disclosure of your information is necessary to protect our rights, protect your or other users' safety, investigate fraudulent activity, or respond to legal requests from governmental authorities; and
- To fulfill any other purpose for which you provide your information to us including any way we describe when you provide the information to us or for any other purpose with your consent.

### **How We May Disclose Your Information**

We may share aggregated Anonymous Information about our users, and other information that does not identify any particular individual, without restriction. With regard to Personal Information we collect or that you provide, we may disclose such information as described in this Privacy Policy, including:

- To our subsidiaries and affiliated companies;
- To contractors, service providers, and other third parties we may use to support our business, such as for purposes of servicing or troubleshooting our website or Service, and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- To third parties to analyze data for marketing purposes or assist us with our marketing efforts or customer relationship management needs;
- To third parties or service providers in order to verify your identity and to facilitate payment processing. For example, we use [www.stripe.com](http://www.stripe.com) for payment, analytics, and other business services. Stripe collects identifying information about the devices that connect to its services. Stripe uses this information to operate and improve the services it provides to us, including for fraud detection. You can learn more about Stripe and read its privacy policy at <https://stripe.com/privacy>. Please note that any personal information you provide to Stripe will be subject to their privacy policy;
- To a buyer or other successor-in-interest to our Company in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us about the users of our website and Service is among the assets transferred;
- To comply with any court order, law, or legal process, including to respond to any government or regulatory requests;
- To enforce or apply our Terms of Use and other agreements, including for billing and collection purposes;
- If in our reasonable judgment we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our Company, our employees or customers, or others, including exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction; and
- To fulfill the purpose for which you provide it, or for any other purpose disclosed by us when you provide the information.

Other than as stated in this Privacy Policy, we do not sell your Personal Information to third parties for purposes of advertising, soliciting, or telemarketing.

### **Your Choices With Regard to Your Information**

We aim to provide you with choices regarding your Personal Information that you provide to us. To accomplish this, we have implemented certain features to provide you with control over your information, namely:

Account Information: You will be permitted to access your account (with an established user name and password) in order to change information you have provided in your account. For example, you will be able to delete or amend Safe Zones you have created, information concerning walks with your pet, your pet's profile including its height, weight, and date of birth. You will be able to also edit or leave blank the following fields: (i) your user profile picture (avatar); (ii) last name; (iii) phone number(s); and (iv) the "About User" field. You will also be able to remove payment information or cancel subscriptions, remove someone from having access to your pet (e.g., a dog walker), and you can de-link or remove a single sign on account (e.g., Facebook, Google, etc.).

Opting-Out of Certain Communications: We may on occasion send you marketing or promotional emails about our products and services or those of a third-party. If you choose not to receive such emails from us, you can unsubscribe by contacting us at support@averia.com or by following the "unsubscribe" instructions included in the emails. Please note however that you will not be permitted to opt-out of any communications we are required by law to send to you, other related notices concerning your use of our website or Service such as emails notifying you of changes to the same, or transaction-based emails such as emails confirming your purchases of goods or signing up for a subscription.

Deleting Your Account: Upon your request, by contacting us at support@averia.com we will take reasonable steps to delete your account. Please note however that it might be impossible for us to delete all information completely because of data backups and records of deletions. We may also deny a request to delete if retaining the information is necessary of us or our service providers to: (i) complete a transaction for which we collected the Personal Information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract with you; (ii) detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; (iii) debug products to identify and repair errors that impair existing intended functionality; (iv) exercise free speech, ensure the right of another user to exercise their free speech rights, or exercise another right provided for by law; (v) comply with a legal obligation; or (vi) if we believe the deletion would violate any law or legal requirement, or may be requested in connection with any fraudulent purpose or conduct. You may not remove de-identified, anonymous, or aggregate data from our databases.

Subject to the terms of this Privacy Policy, we will make commercially reasonable efforts to process your opt-out or deletion requests within thirty (30) days of our receipt of the same.

Public vs. Private Account Settings: You will be able to choose to set your account as public or private. In both cases, other users of our Service will be able to see the avatar you have selected, your name, your "About User" section, and your pets associated with your account including your pets' names, breeds, and avatars. However, the main difference between the public and private setting is who will be able to see your information. For public accounts, any registered user of our Service or mobile applications will be able to see your information listed above. For private accounts, then only the people that you share your pet with will be able to see your information described above.

Access to Specific Information: You have the right to request that we disclose certain information to you about our collection and use of your Personal Information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request (*see* “Contact Us” below for contact information), we will disclose to you:

- The categories and specific pieces of Personal Information we collected about you;
- The categories of sources for the Personal Information we collected about you;
- Our business or commercial purpose for collecting or, if sold for any reason, selling that Personal Information;
- The categories of third parties with whom we shared that Personal Information;
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - sales, if any, identifying the Personal Information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

Only you or someone authorized by you may make a verifiable consumer request as set out above related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child. You may only make such a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must: (i) provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative; (ii) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to Personal Information associated with that specific account. We will only use Personal Information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

We endeavor to respond to verifiable consumer requests within forty-five (45) days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

## **Data Security**

We use measures intended to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. For example, we always use commercially reasonable efforts to follow industry best practices for authorization, encryption and access controls. Toward that end, all information you provide to us is stored on secure servers behind

firewalls such as Google Cloud and Google Firestore. In addition, your Personal Information may be stored by third parties who provide services to us, which third parties will be required to maintain such information securely. Any payment transactions will also be encrypted.

Please note that the safety and security of your information also depends on you. Because our website and Service requires registered users to provide unique identifiers such as their username and password, you are responsible for keeping such username and password information confidential. You should not therefore share your username or password information with anyone.

To the extent our website or Service permits you to post information in public areas (e.g., message boards), we urge you to be careful about giving out such information in such public areas. The information you share in public areas may be viewed by other users of our website or Service. You should also avoid sharing computers or devices that you use to access our Service and be sure to log off the Service when you are not using it.

Unfortunately, the transmission of information over the Internet is not completely secure at all times. Although we do our best to protect your Personal Information, we cannot guarantee the security of such personal information transmitted to our website 100% of the time. Any transmission of such information is therefore at your own risk. We are not responsible for the circumvention of any privacy settings or security measures contained on our website or Service.

### **Data Retention**

We will retain your information for as long as your account is active or as needed to provide you with our Service. If you no longer want to use our Service, you may close your account. However, after closing your account, we may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

### **Children's Privacy Policy**

Our website and Service is not intended for children under thirteen (13) years of age. No one under age 13 may provide any personal information through our website or Service. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on our website or Service or through any of their features, register through the website or Service, use any of the interactive or public comment features of the website or Service, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us at the email address at the end of this Privacy Policy.

### **Transfer of Your Information**



Since we are located in the United States of America, your Personal Information will be collected and processed in the United States, which has its own privacy laws regarding data protection. Please note that the laws and regulations in the United States regarding protection of your Personal Information may not be the same as those in the country where you live. Therefore, if you do not wish for your Personal Information to be collected and processed in the United States, your only choice is to not visit our website or use our Service.

### **We May Make Changes to This Privacy Policy**

We may occasionally make changes to this Privacy Policy, which we reserve the right to do in our sole discretion. We may post any changes we make to this Privacy Policy in our mobile applications or on our website, or we may choose to notify you of any major substantive changes by sending you an e-mail. You are responsible for ensuring that we have an up-to-date, active, and deliverable e-mail address for you. You are also responsible for periodically visiting our mobile applications, website, and this Privacy Policy to check for any changes. The date this Privacy Policy was last revised is set forth at the top. Your continued use of our Service following any such changes we make constitutes your consent to follow and be bound by this Privacy Policy, as amended.

### **Contact Us**

If you have any questions, comments, or requests regarding this Privacy Policy, please send us an email at the following address and we will respond to you as soon as we can: [support@averia.com](mailto:support@averia.com)

You may also write to us at Averia Electronics, Inc., 142 West 57<sup>th</sup> Street, 11<sup>th</sup> Floor, New York, New York 10019.