

FRANZ PRIVACY POLICY.

This privacy policy was last revised on **January 22, 2021**

ABOUT US AND SCOPE

Relayr, Inc. (“**relayr**”, “**we**”, “**us**”, or “**our**”) is committed to protecting the privacy of your personal data and personal information (collectively in this privacy policy, “**Personal Data**”). This Privacy Policy applies to our collection, use, disclosure, and processing of your Personal Data collected through:

- our websites (including hellofranz.com, yourfranz.com, hellofranz.io, yourfranz.io) and any dashboard, microsites or portals that we make available to our customers, users and others) (collectively, the “**Sites**”);
- software (such as apps, reference tools, libraries and widgets) that we make available (the “**Software**”) which may be installed on your phone, tablet, wireless device, computer or server (“**Device**”); and
- the relayr Cloud (the “**relayr Cloud**”). The Sites, Software, relayr Cloud and any services we provide in connection with one or more of the foregoing are collectively referred to as the “**Services**”. This Privacy Policy also applies to information that may be transmitted to us by our customers through software provided by them or other third parties (“**Third Party Software**”), through Activated Machines (described below) or through other means. This Privacy Policy does not apply to how third parties collect, use, disclose or retain information.

This Privacy Policy explains our policies and practices concerning the collection, use, disclosure, and processing of your Personal Data collected through the Services and by other related means (for example, through e-mail, phone calls and other communications) and by accessing and using the Services, you accept and consent to this Privacy Policy without limitation or qualification. Further, you understand that by activating an IoT sensor, appliance, or other machine that is enabled to communicate with the relayr Cloud (“**Activated Machine**”), you will be deemed to be using the Services. If you do not agree to the provisions of this Privacy Policy, please do not access or use the Services, do not activate any machine to communicate with the relayr Cloud, and do not otherwise transmit any information to us through other means.

PERSONAL DATA WE COLLECT AND HOW WE USE IT

When you visit or access our Sites and/or use the Services, we collect certain data automatically in addition to the data that you voluntarily provide to us.

Personal Data Collected Automatically

When you access the Sites and/or use the Services, we use automatic data collection technologies to collect your IP address, browser information (such as type, version, location and carrier), operating systems information, referral URL information, network information, your location, login dates and times, language preferences, and information about how and when you access and use the Sites and/or Services (such as page visits and views, link clicks, etc.). We collect this data through cookies, server logs, and other technologies, such as web analytics tools, as well as IoT sensors and other equipment (including Activated Machines).

Your Personal Data may be also collected automatically through the Software, Third Party Software and directly from an Activated Machine through the relayr Cloud. Please be aware that certain Software installed on your Device may access other files on your Device, such as your contacts, photographs, audio and video clips and your contact information. If you activate your machine through Third Party Software, your Personal Data may be transmitted to us by such Third Party Software in addition to, or instead of, directly through your Activated Machine.

Use of cookies

While you are online, your computer saves “cookies.” A “cookie” is a small file, typically made up of letters and numbers, that is saved to your Device or in your browser’s memory. Cookies contain information about your visit to the Sites and/or use of the Services and serve to make our Sites and Services more user-friendly, effective, and secure. Some of the cookies that we use are “session cookies,” which are automatically deleted as soon as you leave the Sites and Services. Other cookies, such as “persistent cookies”, remain on your Device until you delete them, which allows us to recognize your browser the next time you visit. Cookies that remain on your Device may also allow your browser to load previously viewed pages faster.

Cookies allow us to improve the usefulness of our Sites and Services and help us provide the best possible experience. These cookies do not reveal your specific identity (e.g., your name), but may include information related to your device or location (e.g., your IP address). We perform anonymous, statistical analyses of the use of the Sites and Services (e.g., tracking the number of times users visit the Sites and Services, tracking the number of visitors to our Sites and Services, analyzing users’ interactions with our Sites and Services), and do not identify you personally in such analyses.

You can change your browser settings so that you are notified when cookies are being used. You can also change your browser settings to allow cookies only once, refuse them completely or refuse them just in certain cases. You may also activate the automatic deletion of cookies when you close your browser. Please note that deactivating cookies may restrict the Sites and Services functionality and impact or impair your experience on the Sites and Services.

Server Log Files

Log data that your browser and/or mobile application sends to us is collected automatically and saved in server logs, verbose logging files or log tables (“**Log Files**”). The Log Files contain:

- Browser type, version, location and carrier
- Operating system and/or platform information
- Referrer URL (the URL that the user comes from)
- Host name (network name) of the accessing computer and network type
- User ID
- Mobile device ID and model (if applicable)
- Dates and time when the Sites and Services are accessed
- Pages visited and viewed
- Geolocation information (if location services are turned on)

Web analytics tools and other technologies

We use web analytics tools and applications, such as Google Analytics (the Universal Analytics library), to collect data so that we may better understand our traffic and make the Sites and Services more user-friendly, efficient, and secure. Data collected automatically through Google Analytics includes, IP addresses, user group and preference information, browser types, carrier and location, referring pages, pages visited and viewed, link clicks, login date and time spent on a particular Sites and Services. Google Analytics may place and use cookies to collect and report data on your visit and use of the Sites and Services. More information about Google Analytics and privacy is available here: <https://support.google.com/analytics/answer/6004245?hl=en>

Other means of automatically collecting Personal Data

We may also use clear GIFs or web beacons to track usage patterns of users of the Services. Additionally, we may use clear GIFs in HTML-based emails sent to our users to track which emails are opened by recipients. The information collected through these means is used to enable more accurate reporting and make the Services better for

our users.

Data collected by IoT sensors

The Services may interoperate with IoT sensors (e.g. Activated Machines), equipment or other devices that collect data about the equipment located at your premises. Generally, this data is not Personal Data as it is about your premises (for example, the condition of the equipment where the sensors are installed) and is not identifiable to an individual. To the extent any such IoT sensor, equipment, or other device data or information is Personal Data, we will process such Personal Data in accordance with this Privacy Policy and applicable law.

Personal Data That You Provide Voluntarily

Our relationship with you (including the Site(s) and Services that you use and any other products and/or services you request) will dictate the types of Personal Data that we collect from you and our uses of such Personal Data. For example, we collect and use different Personal Data according to whether you are an a customer to whom we provide Services, a passive visitor of our Site(s), or otherwise.

Where you provide Personal Data to us about other individuals (for example, where you are a customer to whom we provide services and you provide us with Personal Data about your employees or your own customers), we will also collect, use, and disclose their Personal Data (if any) as set out in this Privacy Policy. You must be authorized by such individual(s) to provide us with their Personal Data and it is your responsibility to refer such individuals to this Privacy Policy before providing us with Personal Data on their behalf.

Personal Data that you provide us

Personal Data that you may provide to us may include the following:

- Contact information, such as: first and last name, title, company name, e-mail address, phone number, location and postal address.
- Authentication and access information, such as: username, password and related security information.
- Policy and claim information (including materials submitted as part of a claim). Feedback, inquiries and/or other communications about the Sites and Services and our products and services.
- Your preferences, such as: language, date format, notification method, postal code, and time zone.

Collecting, Using, and Processing Your Personal Data

We process your Personal Data (including Personal Data collected automatically) in accordance with this Privacy Policy and applicable laws for the following purposes:

- To create an account when you register with us;
- To fulfill your requests, respond to your inquiries, provide services, or complete transactions you have requested;
- To inform you about services that we believe may be of interest to you. If we do so, each communication we send you will contain instructions permitting you to opt-out of receiving future communications of that nature;
- To send you important information regarding the Services, changes to our terms, conditions, and policies and/or other administrative information. Because this information is essential for us to provide the Services to you, you may not opt-out of receiving such communications;
- To resolve problems or issues with the Services or other users;
- For our internal business purposes, such as data analysis, audits, developing new products or services, enhancing and improving the Services and identifying usage trends; and
- As we believe to be necessary or appropriate: (a) in any manner permitted under applicable law, including

laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations, business and systems; (f) to protect our rights, privacy, safety or property, and/or that of other users, including you; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Lawful basis for processing your Personal Data

Depending on the circumstances, one or more of the following may be the lawful basis for how we process your Personal Data:

- Consent. Allows us to process your Personal Data when you have affirmatively and freely consented to our processing. You may withdraw such consent at any time by contacting us through the contact information set forth below.
- Contract. Allows us to process your Personal Data when it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.
- Legitimate Interest. Allows us to process your Personal Data on the grounds that you or your organization would reasonably expect and which have a minimal privacy impact or where there is a compelling justification for the processing – this can include commercial interests.

Personal Data does not include information that has been aggregated or anonymized so that individuals cannot be re-identified by us or a third party (“**Anonymized Data**”). We may use Anonymized Data for the non-exhaustive purposes of: (i) improving our business operations, products, Sites, Services, Software, or relayr Cloud; (ii) our own research and development; or (iii) for any other purpose we deem reasonable or appropriate. We reserve the right to provide Anonymized Data to third parties for any purpose including, but not limited to, any purposes set forth in this Privacy Policy.

SHARING YOUR PERSONAL DATA

We will keep your Personal Data confidential and only share it with others in furtherance of one or more of the purposes above.

Internal Sharing

We share your Personal Data, on a confidential basis, with those departments and personnel who are responsible for the applicable use and/or processing activity and who certify that they will comply with corporate policies implemented and maintained to keep your Personal Data confidential.

Sharing With Third Parties

We may share your Personal Data with: (a) our affiliates and subsidiaries for the same purposes and on the same bases set out in this Privacy Policy; and, (b) third party service providers to perform the functions they carry out on our behalf and who are bound by contractual agreements that include appropriate privacy standards. A list of the categories of third-party service providers to whom your Personal Data may be transferred is provided below:

- any agent or representative acting for you;
- actuaries;
- auditors;
- law firms and other advisors;
- credit referencing, debt collection and fraud and prevention agencies;

- marketing service providers;
- IoT equipment or service providers;
- IT service providers, IT maintenance providers, and cloud service and hosting providers;
- regulators and other applicable governmental bodies;
- selected third parties in connection with any sale, transfer, or disposal of our business; or
- any other person where necessary to perform a contract with you, to protect ourselves from risk, or to anyone to who we are otherwise required or permitted by law to disclose your Personal Data.

Where required or permitted by applicable law, we will report or disclose Personal Data to authorities (such as law enforcement) where we reasonably believe that the Sites and Services or our other internet presence is being used fraudulently or illegally (for example, a hacking attack on our network).

TRANSMITTING YOUR PERSONAL DATA INTERNATIONALLY

Please be aware that the Personal Data that we collect may be transferred to, stored in, or processed in the United States and other countries, where our servers are located and our database is operated, or where our third-party service providers servers and/or databases are located. If you are visiting the Sites and Services from outside of the United States, please be advised that the data protection laws of the United States may not be as comprehensive as those in your country of residence and that your Personal Data is subject to the laws of the United States or of the other country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of the United States or such other country, pursuant to the laws of the United States or such other country.

You may also request more information regarding our data transfers, including transfers to service providers outside of your country, and the steps we take to safeguard your Personal Data by contacting us using the contact information set forth below.

SALE

We do not and will not sell any of the Personal Data that we collect and have not done so in the last twelve (12) months.

THIRD PARTY SITES

For your convenience, our Sites may contain links (embedded or otherwise) to websites, online services, or mobile applications that are operated by third-parties (“**Third Party Sites**”). These Third Party Sites are operated independently from our Sites and Services. We are not responsible for the content, security or privacy policies of any such Third Party Sites. You should review the specific privacy policies of those Third Party Sites to determine how they collect, protect, store, use, and process your Personal Data.

SECURITY

We take the security of your Personal Data seriously. We have implemented appropriate physical, organizational, contractual and technological security measures and procedures appropriate to the sensitivity of the Personal Data and which are designed to protect against loss, misuse, unauthorized access, alteration, and disclosure of your Personal Data. The only employees who are granted access to your Personal Data are those with a business ‘need-to-know’ or whose duties reasonably require such Personal Data. We ensure that all affiliates and other third parties that are engaged to perform services on our behalf and are provided with Personal Data are contractually required to observe the intent of this Privacy Policy and our privacy practices. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at the address provided in the notice provision below.

RETENTION OF YOUR PERSONAL DATA

We will keep your Personal Data for as long as reasonably necessary to fulfill the purposes for which it was collected, in accordance with this Privacy Policy, and to comply with our legal and regulatory obligations. We have a detailed retention policy in place that governs how long we will retain your Personal Data. The exact time period of retention will depend on your relationship with us and the type of Personal Data collected, as well as applicable laws. If you would like more information regarding the periods for which your Personal Data will be stored, please contact us using the contact information set forth below.

YOUR RIGHTS

To the extent provided by law, you may have the right to:

- request access to your Personal Data;
- request updates or corrections to your Personal Data or challenge the accuracy or completeness of your Personal Data;
- request that we delete your Personal Data;
- request a disclosure of the Personal Data that we have collected from you;
- request that we transfer your Personal Data;
- request that we restrict access to your Personal Data;
- object to our processing of your Personal Data; or
- lodge a complaint with your local data privacy regulator.

The rights listed above may not apply in every circumstance or to every user. You can exercise your rights or request more information about your rights by contacting us using the contact information below. If we require further information from you to process your request or verify your identity, one of our staff will contact you. Verification of your identity may be through various means, including but not limited to verification against our own records, through use of a password protected account that you maintain with us, or by other means we deem appropriate given the nature of the request and the Personal Data involved. In any case, we will attempt to respond to each of your requests not later than thirty (30) days after receipt of such requests or in such other timeframe as may be specified by applicable law. We will advise you in writing if we cannot meet your requests within this time limit.

Please note that there may be certain circumstances where we cannot comply with your request; such as where complying with it would mean that we couldn't comply with our own legal or regulatory requirements or an exemption under applicable law applies to the specific circumstances. In these instances, we will let you know why we cannot comply with your request.

How to 'opt out' from marketing

You have control over the extent to which we market to you and can request that we stop sending you marketing messages at any time. You can do this by either clicking on the "unsubscribe" button in any marketing email that we send to you or by contacting us using the contact information set forth below.

Please note that even if you opt out from receiving marketing communications, we may still send you service-related and administrative communications from which you cannot opt out without choosing to discontinue your use of the Sites and Services.

CALIFORNIA RESIDENTS: YOUR PRIVACY RIGHTS

Under the California Consumer Privacy Act of 2018 ("CCPA"), California residents have certain rights with respect to our collection, use, and sharing of their Personal Data.

We collect various categories of Personal Data when you use the Site(s). A detailed description of the data we collect and how we use it is provided above (Section entitled - “*Data we collect and how we use it*”). You will find that the Section entitled “*Sharing your Personal Data*” describes the categories of third parties with whom we share your Personal Data and what information may be shared under different circumstances.

We will not discriminate against you for exercising your rights under the CCPA. We will not: (i) deny goods or services to you, (ii) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of goods or services, or (iv) suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services. We do not offer financial incentives associated with our collection, use, or disclosure of your personal information.

Separate from the CCPA, California’s Shine the Light law gives California residents the right to ask companies what Personal Data they share with third parties for those third parties’ direct marketing purposes. We do not disclose your personal information to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure.

If you have any questions regarding this privacy policy or wish to submit a rights request to us, please use the contact information provided below.

CHILDREN’S USE OF THE SITE(S)

The Sites and Services are not directed to or intended for children. We do not seek or knowingly collect Personal Data from individuals under the age of 18. If you are under the age of 18, we request that you do not access or use the Sites and Services. For more information, please visit the Federal Trade Commission’s website to learn more about the Children’s Online Privacy Protection Act (“**COPPA**”).

DO NOT TRACK DISCLOSURE

“Do Not Track” is a preference that you may be able to set on your browser (if supported) to opt out from online behavioral tracking. The Sites and Services do not collect personally identifiable data about you as you move across different third party websites over time in order to provide targeted advertising and, therefore, do not respond to “Do Not Track” signals.

OUR CONTACT INFORMATION

For any questions regarding this privacy policy, how to exercise your rights, or to inquire about our collection, use, disclosure, and processing of your Personal Data, you may contact us via e-mail at datenschutz@relayr.io

Data Protection Officer

relayr is headquartered in Berlin, Germany and in Boston, MA. We have appointed an internal data protection officer for you to contact if you should have any questions. The relayr data protection officer’s name and email address are as follows:

Gunnar Daft

datenschutz@relayr.io

Your authorized agent may also make requests on your behalf. Please have your authorized agent contact us using the information above and to include the proper documentary evidence that demonstrates their authority to make such a request on your behalf. Such documentary evidence includes a signed permission by you or a properly executed power of attorney. Where you have provided signed permission to the authorized agent, we may take steps to verify your identity or directly confirm with you that you have authorized the agent to make a request on your behalf.

CHANGES TO THIS PRIVACY POLICY

From time to time, we may need to make changes to this Privacy Policy (for example, as the result of changes to law, technologies, Site content, the Services, or any other developments). We will provide notice of such changes by posting them on the Sites and Services and/or contacting you. By continuing to access or use the Services after any such changes, you accept and consent to this Privacy Policy without limitation or qualification. This Privacy Policy is current as of the “last revised” date which appears at the top of this page. You can also access this www.hellofranz.com/franz-relayr-privacy-policy.pdf periodically to view the most recent version.