



Last Modified: July 2016

## GENERAL INFORMATION:

PLEASE READ THIS PRIVACY STATEMENT AND NOTICE OF PRIVACY PRACTICES FOR ASURION'S MOBILE APPLICATIONS CAREFULLY.

The purpose of this Privacy Statement and Notice of the Privacy Practices for Asurion's Mobile Applications ("Privacy Policy") is to inform you, the user ("You" or "Your") of the privacy practices of Asurion, LLC and/or its subsidiaries and affiliates (collectively "Asurion") related to the access, collection, use and disclosure of certain technical information from your mobile device (" Technical Data") along with Your personally identifiable information ("Personally Identifiable Information" or "PII") through Your downloading, activation and use of Asurion's mobile applications and services.

## DESCRIPTION OF APPLICATIONS FOR WHICH THIS PRIVACY POLICY APPLIES:

This Privacy Policy applies to your use of the following mobile applications and services:

### **SOLUTO® CONNECTED HOME ADVISOR**

The application and services shall, for the purposes of this Privacy Policy, be referred to as the "Application," and the functionality and services provided to You which are supported by the Application may be referred to collectively as the "Services"). For more details regarding the specific Services available through your downloading and use of these individual Application and Service offerings you may click here: <https://www.asurion.com/app-center/>.

We take the privacy of your PII seriously. If you have any questions or concerns about this Privacy Policy or Your PII please contact us directly at [privacy@asurion.com](mailto:privacy@asurion.com) or by mail at:

Asurion  
Attn: Office of the General Counsel  
648 Grassmere Park  
Nashville, TN 37211

## CHANGES AND UPDATES TO THIS PRIVACY POLICY:

Asurion reserves the right to revise or update this Privacy Policy. Asurion also reserves the right at any time to add new or remove existing Applications and Services. Asurion will notify you of any changes to the Privacy Policy by posting the revised or updated Privacy Policy and its "Last Modified" version. Your use of the Application and the Services thereafter constitutes your agreement to and acceptance of the Privacy Policy and its revisions or updates. You should periodically read the Privacy Policy to learn of any revisions or updates.

In the event we materially change the way in which we use Your Technical Data or your PII, we will provide you with notice and ask you to affirmatively accept the changes to a new Privacy Policy. If

you do not agree to the terms and conditions of this Privacy Policy, including having Your Technical Data or Your PII used in any of the ways described in this Privacy Policy, do not provide us with your information. If you do not agree to any terms of this Privacy Policy, please do not download or use the Application or Services.

This Privacy Policy only applies to our Applications or Services that display or link to this Privacy Policy. For purposes of clarification, this Privacy Policy does not apply to: (1) any of our Applications or Services that do not display or link to this Privacy Policy, (2) any of our Applications or Services that display their own individual Privacy Policy, or (3) information we collect from You or about You in other ways beyond Your use of the Application or Services. By using our Application or Services, you acknowledge that you have read this Privacy Policy and consent to Asurion's privacy practices as described in the Privacy Policy, including our use and disclosure of Your Technical Data and PII for the purposes described below. You further affirm Your consent to this Privacy Policy when you download and use our Applications or Services. This Privacy Policy is not intended to and does not create any contractual or other legal right in or on behalf of any person. This Privacy Policy is incorporated as part of the Terms of Use that apply with respect to Your use of the applicable individual Application and Service.

## CONTACT AND ELECTRONIC COMMUNICATIONS:

By downloading our Application, using our Services, allowing us access to Your Technical Data through your mobile device or providing us with Your PII, you agree that we can communicate with you electronically regarding legal, technical, regulatory, security, privacy and any administrative or consumer notification obligations relating to your use of the Application and Services.

If You have any questions about this Privacy Policy or about our Application or Services, or want to request access to, correction or deletion of Your PII, You can contact Asurion by e-mail at [privacy@asurion.com](mailto:privacy@asurion.com)

You may also contact us at  
Asurion  
Attn: Office of the General Counsel  
648 Grassmere Park  
Nashville, TN 37211

## SUMMARY OF PRIVACY POLICY:

This Privacy Policy notifies you of:

- the types of information collected from you when you download and use our Application or the Services;
- how your information is used by Asurion;
- with whom the information may be shared;
- what choices are available to you regarding collection, use and distribution of your information; and
- the kind of procedures Asurion employs in an effort to hinder the unauthorized access, deletion, alteration, use or disclosure of information you provide to Asurion or by using our Application or the Services.

## INFORMATION COLLECTED BY THE APPLICATIONS:

When You choose to download and use the Application and the Services, Asurion may access, collect, use or disclose the following types of information from You:

***Personally Identifiable Information:***

(PII) includes without limitation as follows: Your full name, mailing address, email address and cell phone number and generally information that may identify You as an individual.

***Technical Data:***

Asurion automatically collects Technical Data about Your mobile device on a daily basis and in some instances as frequently as three times per day. Depending on which operating system your mobile device utilizes some Technical Data may be gathered more or less frequently or not at all.

This Technical Data may include: Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data; telephony data, i.e. Your network type, network operator name, subscriber identity module ("SIM") operator name, SIM country; Your mobile device number, device serial number and media access control ("MAC") address; carrier name; operating system version; device model; performance and data usage, i.e. data storage amount, Central Processing Unit ("CPU") and memory consumption; other usage logs; battery status and battery usage patterns and power consumptions; lists of other installed applications; listing of types ( i.e. Gmail, Yahoo, etc.) of other e-mail accounts configured to Your device; device information related to Your choice of settings for your device such as Wi-Fi, Global Positioning System ("GPS") settings, bluetooth setting; mobile device settings; screen brightness and roaming data; the names of email accounts configured to Your device; and other technical information Asurion may need to perform the Services. Technical Data may also include Your aggregated anonymous non-public personally identifiable information.

The Services may also allow you to store or back up user generated or collected data such as contacts, photos and videos to Asurion storage systems. By downloading the Application and using the Services You accept the terms and conditions as outlined in this Privacy Policy. You authorize Asurion to access, collect, use and disclose Technical Data and PII from You, Your carrier and other third party service providers and You authorize those parties to release such Technical Data and PII to Asurion notwithstanding such third parties' individual privacy policies.

Asurion may also use your PII in other ways, such as to provide you with information about the Application, the Services, other offers that may be of interest to you, to seek follow-up from you about your experiences with Asurion or as otherwise disclosed to you during the process of downloading the Application. Where appropriate, Asurion will seek your express consent to send such messages, including when sent by email or other type of commercial electronic message. This consent is sought by Asurion, LLC, 648 Grassmere Park, Nashville, TN 37211. You may withdraw your consent by using the "unsubscribe" link located at the bottom of such messages you receive from Asurion, or by contacting Asurion at the phone number listed in the applicable Terms of Service for the Application.

Asurion may share Your PII and Technical Data with its affiliates, subsidiaries and partners and with other third parties for similar purposes as more fully described in this Privacy Policy. Additionally, to the extent required by applicable federal or state law, Asurion may provide Your Technical Data and/or PII to others.

## RETENTION AND DELETION OF PII and TECHNICAL DATA:

Asurion will retain your PII and/or your Technical Data for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws, and You consent to such purposes(s) and Your consent remains valid after termination of Asurion's relationship with you. When PII and/or your Technical Data are no longer needed, it will be permanently deleted or de-identified so that it can no longer be associated with a specific individual.

## USE OF PII AND YOUR TECHNICAL DATA:

- Asurion may use Your PII and the Technical Data collected through Your use of the Application or the Services for such purposes as:
- to fulfill a Service to you;
- to complete Your purchase;
- helping to establish and verify Your identity;
- activating and maintaining Your account;
- to the extent that Your carrier does not provide such services, billing and resolving billing disputes;
- maintaining and providing data back-up services to You, if applicable;
- monitoring and maintaining the performance and functionality of the device consistent with your choices where applicable through the device settings;
- providing You with location-based services, including the locations of Your current and/or previous devices;
- providing You with expert technical support and consulting services and click to chat functionality with Asurion representatives to resolve device issues and answer questions about device usage;
- auditing, research and analysis in order to provide, maintain, protect and improve our Services;
- contacting You to offer the Application or Services updates and notices, promotional notices and other information about the Application and Services available from Asurion or its affiliates (You may choose not to allow Asurion to use or disclose Your PII or Technical Data for marketing and promotional purposes by contacting Asurion as outlined in the Contact and Electronic Communications section of this Privacy Policy);
- providing you with products or services or carrying out the transaction(s) you have requested or authorized;
- responding to Your questions, inquiries, comments and instructions;
- improving the Application by solving technical problems, calculating overall usage statistics, internal marketing and promotional purposes, product development and content improvement;
- taking good faith steps to enforce the applicable Terms of Service;
- to comply with law, or in the good faith belief that such action is necessary to conform to the requirements of law, or comply with legal process served on us, and to protect and defend our rights or property, including our rights and property and our services, or act in urgent circumstances to protect Your personal safety;
- to track and analyze non-identifying, aggregate usage and volume statistical information from our customers and provide such information to third parties that provide services to Asurion;
- to protect against fraud and potential fraud;
- notify you of any known breach of Your PII or technical data; and
- maintaining the security and integrity of the Application, the Services and Asurion's systems.

## SHARING AND DISCLOSURE OF PII AND TECHNICAL DATA:

- Except as explained and set forth in this Privacy Policy, Asurion will not use or disclose Your PII or Technical Data to nonaffiliated third parties for any other purpose.
- Asurion may transfer or license Your PII to trusted nonaffiliated service companies to assist Asurion in providing, maintaining and operating its technical support services, data back-up service and location based services or for other reasons necessary to provide, maintain and/or continue the operation of its own business or marketing. Asurion requires these service-related companies to comply with the principles set out in this Privacy Policy, and requires them to use such information only for the purposes for which it was provided to them;
- You understand and agree that Asurion reserves the right to disclose and/or transfer PII or Technical Data to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any of assets or shares of business or a division thereof in order for You to continue to receive the same or similar products and services from the third party. In such an event, we shall provide notice of any material change to this Privacy Policy, or our Services, in the manner described in this Privacy Policy;
- Asurion may disclose your PII or Technical Data to comply with the law and/or legal process where a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- Protect or defend our rights and/or property or the rights and property of others;
- Enforce our Terms of Use and/or this Privacy Policy;
- Respond to claims that the content(s) of a communication violates the rights of another.
- In these circumstances, PII or Technical Data may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

## ACCURACY AND COMPLETENESS OF YOUR INFORMATION:

Asurion takes various steps to reasonably ensure the accuracy and completeness of PII. However, Asurion also relies on You to provide accurate and complete information when interacting with Asurion for any purpose.

## ACCESS TO AND ABILITY TO CORRECT OR DELETE YOUR INFORMATION:

Upon request via postal mail or e-mail Asurion will provide you a summary of Your PII and the Technical Data retained by Asurion. As allowed by law and consistent with our applicable partner agreements, You may modify, correct, change, or request Asurion to delete or update any PII that Asurion has collected through the Application by contacting Asurion via postal mail or e-mail as provided in the Contact and Electronic Communications section of this Privacy Policy. You may also request specific information regarding the types of Technical Data collected and retained by Asurion as described in this Privacy Policy.

## APPLICATION AND MOBILE DEVICE SECURITY:

Asurion has implemented measures to help protect against the unauthorized access, loss, misuse and alteration of the Technical Data and Your PII. Asurion utilizes security measures and encryption technology to help protect the integrity of the Technical Data and your PII. After the Application is installed, the Technical Data and your PII generally is encrypted before being transmitted over the Internet to Asurion. The Technical Data and your PII will be encrypted by your phone before it is transferred to Asurion storage systems. Notwithstanding the foregoing, technology limitations may prevent encryption in some instances. Once Asurion receives the Technical Data and your PII, it is authenticated and protected by a firewall and/or encryption.

Asurion uses commercially reasonable physical, managerial, and technical safeguards designed to protect against loss, theft, misuse, disclosure, alteration and destruction of or unauthorized access to your PII. Asurion cannot, however, ensure or warrant the security of any information that Asurion receives on your behalf to operate the Services or that you transmit to Asurion, including your PII and you do so at your own risk. Asurion also cannot guarantee that such information will not be accessed, disclosed, altered, or destroyed by breach of any of Asurion's physical, technical, or managerial safeguards. While Asurion uses commercially reasonable data encryption, Asurion cannot ensure or warrant the security of any of Your Technical Data or Your PII while in transit from Your mobile device to our servers. Asurion will notify You of any confirmed security breach of Your Technical Data or PII to the extent required by and in accordance with applicable state and federal law. Asurion may attempt to notify you so that you can take appropriate protective steps or Asurion may post notification on [www.Asurion.com](http://www.Asurion.com) if a security breach has been confirmed by Asurion. Depending on where you live, you may have a legal right to receive notice of a security breach in writing in which case Asurion will notify you in writing of such security breach.

Your mobile device may contain other third party software or third party applications which collect and transmit PII or other Technical Data. Asurion is not responsible for any PII or other information which may be stored or transmitted by any such third party software. In addition, Asurion is not responsible for any PII or other information that you display publicly or that becomes publicly known as a result of Your actions.

## THIRD PARTY APPLICATIONS AND WEBSITES:

The Application may contain embedded links to other third party websites or to applications operated by non-affiliated or independent third parties. Please be aware that those applications and websites may collect PII or Technical Data from You about Your visit. These websites and applications have not necessarily been reviewed by Asurion and are maintained by third parties over which Asurion exercises no control. Accordingly, Asurion expressly disclaims any responsibility for the privacy policies, information collection practices, content, accuracy of the information, and/or quality of products or services provided by or advertised on these third-party applications and websites. Moreover, these links do not imply an endorsement with respect to any third party, websites or the applications or services provided by any third party. You should review the privacy policies for any websites or applications that you use, before using

the application or website and providing Your PII or allowing access to your Technical Data. Asurion is not responsible for the privacy policies or practices of any third party applications or websites that may be mentioned on, or accessible from, the Application or through the Services.

## CHILDREN UNDER 13

The Application and Services provided by Asurion are not directed to persons under 13. Asurion does not knowingly collect PII from children under 13. If you become aware that your child is accessing the Application or Services and providing PII without your consent, please contact us by using the information provided in the Contact and Electronic Communications section of this Privacy Policy. Asurion will take steps to remove PII from Asurion Storage Systems and terminate the account should Asurion determine that a child under 13 has accessed the Services.

## CALIFORNIA PRIVACY RIGHTS:

This notification is required under California law. Under California law, California residents may opt-out of Asurion disclosing personal information about them to third parties for their marketing purposes. If You are a California resident and do not want Asurion to disclose Your information to other companies for their marketing purposes, please contact Asurion by any of the ways described in the Contact and Electronic Communications Section above. Pursuant to Section 1798.83 of the California Civil Code, residents of California have the right to request from a business, with whom the California resident has an established business relationship, certain information with respect to the types of PII the business shares with third parties for direct marketing purposes by such third party and the identities of the third parties with whom the business has shared such information during the immediately preceding calendar year. To request a copy of such information, please contact Asurion by any of the ways described in the Contact and Electronic Communications section above, and Asurion will respond within 30 days as required by law.

## SOCIAL MEDIA:

Any information, communications, or material of any type or nature that you submit to a social media platform or website such as Facebook, Instagram or Twitter through Your use of the Application or the Services by email, posting, messaging, uploading, downloading, or otherwise (collectively, a "Submission"), is done at Your own risk and without any expectation of privacy. Asurion cannot control the actions of other users of any social media platform or website and Asurion is therefore not responsible for any content or Submissions contained on such sites and platforms. By utilizing any functionality contained as part of the Application that permits Submissions to social media platform or website, you are representing and warranting to Asurion that you have reviewed the applicable Privacy Policy and terms of use of such social media platform or website and that you will abide by all such provisions contained therein. Additionally, in the event that Asurion offers functionality through the Application or Services that permits the posting of Your information on message boards or any other interactive or social-type feature, please be aware that these areas may allow you to publicly post, and share with other users, certain messages, content, or other information (e.g., stories, pictures, ingredients, tips, etc.). Asurion encourages you to be wary of giving out any PII that may appear in such public forums. The information you post can be collected and used by people you don't know. Asurion cannot guarantee the privacy and safety of these areas and is therefore not responsible for any information you choose to post. Your use of these features is fully at your own risk.

## INTERNATIONAL USERS:

**FOR NON US RESIDENTS:** We may transfer information that we collect about you, including Your Technical Data and Your PII , to subsidiary and affiliated entities, or to other third parties across borders and from Your country or jurisdiction to other countries or jurisdictions around the world. If You are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that You are transferring information about You, including Your Technical data and Your PII, to a country and jurisdiction that does not have the same data protection laws as the European Union, and You consent to: the transfer of information about You, including Your Technical Data and Your PII, to the U.S.; and the use and disclosure of information about You, including Your Technical Data and Your PII, as described in this Privacy Policy.

## MONITORING AND ENFORCEMENT:

Asurion has implemented various measures to monitor compliance with and enforce the elements in this Privacy Policy. If you have a privacy related inquiry, complaint or dispute, please contact us at the email or postal address listed in the Contact and Electronic Communications section of this Privacy Policy.