Last updated: May 4, 2017

We value privacy, especially yours

At Asurion, we take protecting your privacy seriously. In order for our products and services to function properly, we need to collect and use certain Personal Information and Technical Data (collectively Information). This Privacy Policy explains Asurion's privacy practices. This Privacy Policy is meant to help you understand what data we collect, why we collect it, and what we do with it related to your use of our mobile apps. This is important; we hope you will take time to read it carefully. As used in this policy, Asurion includes Asurion LLC and its subsidiaries and affiliates.

When you download and use our app, you acknowledge that you accept the Terms of Use and Privacy Policy without exception. You also acknowledge that you consent to our privacy practices, including our use and disclosure of your Personal Information.

If you do not consent to the Terms of Use or Privacy Policy, please do not download or use the app or provide any Personal Information.

This policy is incorporated as part of the Terms of Use that apply to your use of the app.

What's covered by this policy

Any app which links to this policy, is covered by this policy.

This policy does not cover and we are not responsible for third-party websites or apps that may be linked from our app; linking to them does not imply an endorsement. We are not responsible for these websites or apps or any information they may collect. You should always review the privacy policy of any third party website or app.

Information we collect

When you download and use the app, we may collect the below types of Information.

Personal Information:

- Name;
- Mailing address;
- Email address;
- Cell phone number;
- Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data;
- Device serial number and media access control ("MAC") address;
- Information collected after obtaining your permission during your use of the app;
- Usernames of accounts to which you provide access;
- Passwords which you choose to share with the app for safekeeping
 - NOTE: Passwords that you share are not visible by, transmitted to, or stored by Asurion in clear text. They are saved on your device, with only an encrypted copy being sent to Asurion for which we do not have the

encryption key. This allows you to use the app seamlessly on multiple devices, without your password leaving your device in a usable format.

- Copies of information that you choose to backup from your phone;
- Other information that personally identifies you or is linked or linkable to you.

Technical Data:

This Technical Data may include:

- Telephony data, i.e. your network type, network operator name, subscriber identity module ("SIM") operator name, SIM country;
- 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 apps;
- Listing of types (i.e. Gmail, Yahoo, etc.) of other email 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, and Bluetooth settings. We do not collect your geolocation. We only collect data to determine if GPS is turned on or off on your phone, which assists in troubleshooting if you ever need it
- Mobile device settings;
- Screen brightness and roaming data;
- Other technical information Asurion may need to provide you with services;
- Aggregated, anonymous non-public Personal Information.

How we use your Information

Asurion may use the Information to:

- Fulfill a service to you;
- Complete your purchase;
- Establish and verify your identity;
- Activate and maintain and your account;
- Handle and resolve billing disputes;
- Maintain and provide back-up services, including user-generated or collected data such as contacts, photos and videos;
- Monitor and maintain the performance and functionality of the device consistent with your choices;
- Protect and improve our services;
- Offer updates, notices and other information about apps and services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion's use or disclosure of your Information for marketing and promotional purposes by contacting Asurion as outlined in <u>Where to turn with questions</u> section of this policy;

- Respond to your questions, inquiries, comments and instructions;
- To enforce the applicable Terms of Service;
- Comply with the law and defend our rights;
- Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
- Protect against fraud and potential fraud;
- Notify you of any known breach of your Information; and
- Maintain the security and integrity of the app, and Asurion's systems and services.
- Identify usernames of other accounts that you may want to include in your use of the app, as described below:

If you choose to allow the app to scan your email account, no connections are made to any other server other than the selected email account. The sign-in and authentication takes place using your device's account manager system. The app will never see or transmit your password and instead will use a token to log into that account. After signing-in, the app will only look at the mail headers and messages to extract the service name, service URL, and username. No information is transmitted to any server at any point of the process of the extraction. The extracted information is stored in the local app memory of the device in which it is run and only for that duration, and it is deleted immediately after results are shown.

A note about fingerprints:

If you choose to allow the app to authenticate you using the fingerprint scanner on your device, the device manufacturer's built-in fingerprint hardware, software, and security are used. Asurion will not access, collect, store, or transmit your fingerprint. All information related to your fingerprint is stored on the device, and is not accessible to Asurion.

How we share your Information

We will not use or disclose your Information to non-affiliated third parties except as disclosed in this policy.

Asurion may transfer or license your Information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this policy and only use such information only for the purposes for which it was provided to them;
- 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 assets or shares of our 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 will

provide notice of any material change to this policy, or our services, in the manner described in this policy. In these circumstances, Information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your Information to:

- Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- 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;
- Detect, prevent or otherwise address fraud, security, or technical issues.

How we protect your Information

We use commercially reasonable technical, administrative, and physical controls to protect your Information including data encryption where appropriate; however, since the Internet is not a 100% secure environment, we cannot ensure the security of information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such information, you do so at your own risk. We will notify you of any confirmed security breach of your Information to the extent required by and in accordance with state and federal law.

How long we keep your Information

Asurion will retain your Information as long as necessary to fulfill the purposes outlined in this policy, unless a longer retention period is required or not prohibited by applicable law.

How you are notified if the policy changes

We may change this Policy from time to time. If we do, we will post the updated policy with the last revised date. Your continued use of the app means that you consent to the updates. You should periodically read the policy to understand our privacy practices.

If we make material changes to this policy, then we will notify you in the app or by email and seek your affirmative consent.

Communicating with you electronically

By downloading and using our app, you agree that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy) relating to your use of the app.

Commercial messages

Where required, Asurion will seek your express consent to send such messages. 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 our messages, contacting us at the address listed above, or by emailing privacy@asurion.com.

Your rights related to your Personal Information

While we take various steps to ensure the accuracy and completeness of your Personal Information, we rely upon you to provide accurate and complete information when interacting with us.

Upon your request and as allowed or required by law and consistent with our applicable partner agreements, you may request Asurion to take the following actions with your Personal Information: (i) provide you with a copy, (ii) correct, (iii) update, (iv) delete. To make such a request, or if you have a privacy-related complaint, please contact Asurion via postal mail or email as provided in the <u>Where to turn with questions</u> section of this policy.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider at <u>https://feedback-form.truste.com/watchdog/request</u>.

A few notes about social media

Please be aware that any information that you submit to a social media site such as Facebook, Instagram or Twitter is done at your own risk and without any expectation of privacy. Asurion cannot control the actions of social media site users and is not responsible for any content or submissions contained on such sites. You should always review the privacy policy of any third party website or app.

By using any functionality that permits submissions to social media sites, you are indicating that you have reviewed the applicable privacy policy and terms of use of that site. Additionally, in the event that we offer functionality through the app that permits the posting of content on social media, please be aware that these sites may allow you to publicly post, and share this content. Asurion cannot guarantee the privacy and safety of these sites and is therefore not responsible for any content you post. Use these features at your own risk.

Children under 13

The app is not directed to children under 13. We do not knowingly collect Personal Information from children under 13. If you become aware that your child is accessing the app and providing Personal Information without your consent, please contact us by using

the information provided below. We will take steps to remove Personal Information from our storage systems and terminate the account if we determine that a child under 13 has accessed the app.

For non-U.S. residents

We may transfer Information that we collect about you outside of the country in which it was collected. 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 yourself, including your Information, to a country and jurisdiction that does not have the same data protection laws as the European Union. By doing so, you are consenting to the transfer of Information about yourself, including your Information, to the U.S. You are also consenting to the use and disclosure of Information about yourself, including your Information, to the U.S. You are also consenting to the use and disclosure of Information about yourself, including your Information, as described in this policy.

APEC Participation

The Asurion privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found <u>here</u>.

Your California privacy rights

Under California law, California residents may opt-out of Asurion disclosing their Personal Information to third parties for their marketing purposes. If you are a California resident and do not want Asurion to disclose your information to third parties for their marketing purposes, please contact Asurion by any of the ways described in the <u>Where</u> to turn with questions section below and Asurion will respond within 30 days.

Accountability and Governance

Asurion has implemented various measures to monitor compliance with and enforce this policy.

Where to turn with questions

If you have any questions about this policy, about our app, or want to request access to, correction, or deletion of your Personal Information, or have a privacy-related complaint, you can contact Asurion by email at <u>privacy@asurion.com</u>.

You may also contact us at:

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