

Your Privacy Matters to Tsingol.

Our goal is to make sure you know how we collect, use, share and store your personal data when you create a Tsingol account, submit form via our website, interact with our customer support specialists and visit Tsingol websites and app/software covered by this privacy policy.

What Data does Tsingol Collect?

We ask for personal data — such as your name, email address, location and other information — so you can sign in to your accounts, submit required information, receive personalized support, receive important safety information about your devices and get the most out of our products.

When You Make an Account

Tsingol stores information such as your name, email address, phone number and passwords so you can sign in, and it helps us verify your account if you call customer support.

When You Submit Form via Website

Tsingol stores information such as your name, email address, country, phone number, company name, business request etc. so that Tsingol can contact you based on provided information and request.

When You Buy Products

When you buy products from Tsingol, we ask for information such as your name, address, company name and phone number so we can get your order processed and shipped to you.

When You Sync Products

When you sync your device, we collect data such as your IP address, sync time and date and battery level to help identify and resolve errors or syncing issues and to provide better customer support.

When You Contact Tsingol

We know you want to stay off the grid, but we may collect things such as your contact and device information during support calls to ensure that you get the help you need.

#### When You Use Location/ranging features

We need to collect your device's location, of which, corresponding information such as Tag ID, location, time stamps and duration will be stored in the tag. But the data itself is only transferred via gateway to user's own defined server / cloud.

#### When You Use Ranging Features

We need to collect your devices' relative distances, of which, corresponding information such as Tag ID, distance, time stamps and duration will be stored in the tag. But the data itself is only transferred via gateway to user's own defined server / cloud.

### **View Full Privacy Policy**

#### PRIVACY POLICY

Last Updated: September 25, 2020

Your privacy is important to Tsingol. We developed this Privacy Policy to provide you with information on how we process your personal data when you create a Tsingol account, interact with our customer support specialists, make a purchase in one of our stores, visit Tsingol websites and submit certain required information; the website includes a link to this Privacy Policy.

“Personal data” is information relating to an identified or identifiable natural person.

To jump to a specific section of this Privacy Policy, please click on a link below:

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Your Rights

Categories of Personal Data Processed by Tsingol

Personal data that is processed when you create a Tsingol account or submit a form on website:

When you create a Tsingol account, we ask you to provide your email address and name. You can choose to provide only your first name or a nickname instead of your full name if you wish.

When you submit a form on Tsingol website, Tsingol stores information such as your name, email address, country, phone number, business request etc. so that Tsingol can contact you based on provided information and request.

#### PURPOSES AND LEGAL GROUNDS:

(a) Tsingol processes your email address because you use your email address and your password to sign in to your account. The legal ground for processing your email address for this purpose is based on Tsingol's legitimate interest in protecting the security of your account.

(b) Tsingol also processes your email address for the purpose of sending you important information about your Tsingol products, app/software or account, such as important safety information or material changes to this Privacy Policy. The name you provide is associated with your account profile, and is displayed when you submit comments or other material on a Tsingol website or app/software. The legal ground for processing your email address and name for these purposes is Tsingol's legitimate interest in providing you important safety or other information about your Tsingol products, app/software or account or material changes to this Privacy Policy, and in providing you an opportunity to engage with other Tsingol users.

(c) If you provide your opt-in consent to receiving marketing information from Tsingol,

Tsingoal will also process your email address for the purpose of sending you marketing information about Tsingoyal products and app/software. The legal ground for processing your email address for this purpose is your consent. You may withdraw your consent at any time by changing your preferences in your Tsingoyal account or through the unsubscribe link at the bottom of our marketing emails. The marketing emails you receive from Tsingoyal are based on the preferences you provide in your Tsingoyal account, the locale indicated by your Internet Protocol (IP) address, the types of Tsingoyal devices you have added to your account, and any subscriptions included in your Tsingoyal account. The legal ground for processing this data for this purpose is Tsingoyal's legitimate interest in reducing the number of marketing emails sent to each particular customer by selecting which customers receive a particular marketing email rather than sending every marketing email to every customer who has consented to receiving marketing emails.

(d) Tsingoyal also processes your email address to associate it with your Tsingoyal account when you interact with our customer support representatives. The legal ground for this processing is our legitimate interest in providing quality customer support.

Personal data that is processed for some of the remote technical support for Tsingoyal devices:

When you request certain remote technical support, we log data about the transmission, such as the IP address used when providing support, geographic location of the device, information about your device, information about the network (e.g., Wi-Fi or cellular) and device battery level etc.

#### **PURPOSE AND LEGAL GROUND:**

We process this information to help identify and resolve errors or issues. The legal ground for processing this information for this purpose is Tsingoyal's legitimate interest in resolving errors or issues and providing quality product support.

#### **Personal data that is processed when you communicate with Tsingoyal:**

When you interact with our customer support representatives via email, telephone,

online or in person, we collect personal data, such as your name, mailing address, phone number, email address and contact preferences; and information about the Tsingol products you own, such as their serial numbers and date of purchase etc. We also may create event logs that are useful in diagnosing product or software performance-related issues, and capture information relating to the support or service issue. To improve customer service, subject to applicable laws, we may also record and review conversations with customer support representatives, and analyze any feedback provided to us through voluntary customer surveys. With your consent, our customer support representatives may sign in to your Tsingol account, if appropriate, to help troubleshoot and resolve your issue.

#### PURPOSE AND LEGAL GROUND:

We use this information to provide you with customer and product support, to monitor the quality and types of customer and product support we provide to our customers and to facilitate repairs, returns or exchanges. The legal ground for processing this information for these purposes is Tsingol's legitimate interests in providing quality product support. The legal ground for signing in to your Tsingol account or submit form on website, if appropriate, to help troubleshoot and resolve your issue is consent, which you may withdraw.

Personal data that is processed when you use your LocalSense:

If you use a LocalSense and provide your consent, Tsingol will **not** collect data but the tag itself will upload data from your device to your own defined server / cloud. Data can include location, speed, direction, and time and date of recording etc. Only when request by customers for certain technical support, then Tsingol may also may need to access the data stored by the customers to enhance the quality of product performance or fix issues.

#### PURPOSE AND LEGAL GROUND:

This data is aggregated with data from other consenting users and is used to enhance the quality of performance and to fix any issues of LocalSense and any other products

provided by Tsingol. The legal ground for processing this data for this purpose is consent, which customers can request to stop at any time.

Personal data that is processed when you purchase a Tsingol's product or service:

If you purchase a product or service of Tsingol, then Tsingol will collect your name, address and telephone number. We do not view or store your payment card information, only necessary bank account information is required for wiring.-We recommend you carefully review our Privacy Policy.

#### PURPOSE AND LEGAL GROUND:

We collect your name, mailing address and telephone number so we can process your order and fulfill your purchase / request. The legal ground for processing your name, mailing address and telephone number for these purposes is performance of a contract. We also process your personal data as part of our fraud detection processes. The legal ground for processing your personal data for that purpose is our legitimate interest in protecting Tsingol and our customers from attempts to engage in fraudulent transactions.

Personal data that is processed when you purchase a product of Tsingol:

We may collect your name, address, telephone number, or other contact information to generate an invoice in our systems for tax reporting purposes or upon your request.

#### PURPOSE AND LEGAL GROUND:

The legal ground for processing your information for generation of an invoice for tax reporting purposes is fulfillment of a legal obligation. The legal ground for processing your information for generation of an invoice at your request is performance of a contract.

Personal data that is processed when you use location/ranging features on your Tsingol device or app/software:

If you select to use location-based services, such as weather, traffic information, fuel prices, movie times, and local event information access control, asset tracking, chokepoint mitigation information, on your Tsingol device or app/software, then the physical location of your device will be collected, in order for Tsingol to provide you with such location-based services.

#### PURPOSE AND LEGAL GROUND:

The purpose of processing the location of your device is to provide you the location-based services you wish to use. The legal ground for processing this data for this purpose is performance of a contract.

#### Categories of Recipients of Personal Data

##### Other service providers:

Tsingol uses email services from third parties such as Alimail to assist in sending emails. Those services track the activities associated with these emails, such as whether they were opened, whether links in the emails were clicked on, and whether purchases were made following clicks on those links. Tsingol uses this data to analyze the level of engagement with its emails. Tsingol uses third-party service providers to ship purchased products to customers and to help us better understand usage of Tsingol Express and Tsingol websites and app/software. Tsingol uses third-party service providers, like UPS and DHL, to provide parcel delivery services for orders

##### Other disclosures:

We may disclose personal data about you to others: (a) if we have your valid consent to do so; (b) to comply with a valid subpoena, legal order, court order, legal process, or other legal obligation; (c) to enforce any of our terms and conditions or policies; or (d) as necessary to pursue available legal remedies or defend legal claims. We may also transfer your personal data to an affiliate, a subsidiary or a third party in the event of

any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock, including, without limitation, in connection with any bankruptcy or similar proceeding, provided that any such entity that we transfer personal data to will not be permitted to process your personal data other than as described in this Privacy Policy without providing you notice and, if required by applicable laws, obtaining your consent.

#### Transfers of Personal Data

Tsingoal is a global business. To offer our products and services, we may need to transfer your personal data to other our companies in other countries. For customers outside of China, when you create a Tsingoal account, add personal data in your account profile, or upload data to your Tsingoal account, your personal data will be collected and stored on China.

#### **Cookies and Similar Technologies**

Websites:

To help analyze how you and other visitors navigate Tsingoal websites, and compile aggregate statistics about site usage and response rates, we, with assistance from third-party analytics service providers, collect certain information when you visit our site. This information includes IP address, geographic location of the device, browser type, browser language, date and time of your request, time(s) of your visit(s), products you've purchased, page views and page elements (e.g., links) that you click. We may use cookies, pixel tags, web beacons, clear GIFs or other similar tools on our site or in our email messages to assist us in collecting and analyzing such information. We use this information to provide better, more relevant content on our site, to measure the effectiveness of advertisements, to identify and fix problems, and to improve your overall experience on our site. We may also engage one or more third-party service providers to provide online advertisements on our behalf. They may use a pixel tag or other similar technology to collect information about your visits to sites, and they may use that information to send you targeted advertisements.

If you do not want information collected through the use of these technologies, there is a simple procedure in most browsers that allows you to automatically decline many of

these technologies, or to be given the choice of declining or accepting them.

If you reside in the European Union or other jurisdiction that requires us to obtain your consent to use cookies on our sites, then you will have an opportunity to manage your cookie preferences on the sites; except that certain cookies are required to enable core site functionality, and you cannot choose to disable those cookies.

Here are examples of third-party providers of analytics and similar services we currently use:

#### ANALYTICS SERVICES:

Google: Google Analytics is used to track site statistics and user demographics, interests and behavior on websites. We also use Google Search Console to help understand how our website visitors find our website and to improve our search engine optimization. Find out more information about how this analytics information may be used, how to control the use of your information, and how to opt-out of having your data used by Google Analytics.  
<https://marketingplatform.google.com/about/analytics/terms/us/>

LinkedIn: LinkedIn's conversion tracking and website demographics features, helps users understand what happens after a LinkedIn user clicks on LinkedIn Ad by using analytics methods and systems provided by LinkedIn (e.g., Insight tags, pixels and APIs) that allow users to send data to LinkedIn and its affiliates about actions that people take on users' websites or mobile applications ("Event Data").

Find out more information about how this analytics information may be used, how to control the use of your information, and how to opt-out of having your data used by LinkedIn Ads. <https://www.linkedin.com/legal/sas-terms> and <https://www.linkedin.com/legal/l/dpa>

#### TAG MANAGEMENT:

Tsingoal uses Tsingal Tag Management to help manage the various analytics services and cookie and pixel tag technologies Tsingal uses to measure website usage. To provide such services, Tsingal receives basic server log information from users of

Tsingoal's websites (e.g., IP address, browser and operating system information).

#### Application Performance Monitoring:

Tsingoal uses App/software Dynamics to analyze and monitor the performance of our complex ecosystem. To provide such services, App/software Dynamics receives basic request information, including IP address, necessary to detect and diagnose anomalous errors and response times.

#### Social Networks:

Third-party social networks that provide interactive plug-ins or social networking features (e.g., to allow you to connect to Facebook or Google to find friends to add as connections or to "Like" a page) on Tsingoal websites or mobile app/software, may use cookies or other methods (e.g., web beacons) to gather information regarding your use of our websites and app/software. The use of such information by a third party depends on the privacy policy available on that social network's website, which we encourage you to carefully review. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your use of our site with any of your Personal Information that they may have. We may also obtain analytics information from social networks that help us measure the effectiveness of our content and advertisements on social networks (e.g., impressions and clicks).

#### Children

We request individuals under the age of Tsingoal in the Tsingoal and under the age of 16 in the rest of the world not provide personal data to Tsingoal. If we learn that we have collected personal data from a child under 16, we will take steps to delete the information as soon as possible.

#### Privacy Policy Updates

We may update this Privacy Policy from time to time as we add new products and app/software, as we improve our current offerings and as technologies and laws change. You can determine when this Privacy Policy was last revised by referring to the "Last updated" legend at the top of this page. Any changes will become effective upon our

posting of the revised Privacy Policy.

We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice will be provided by email or by posting notice of the changes on the Tsingal websites and app/software that link to this Privacy Policy.

#### Retention of Personal Data

We will retain your personal data as long as your Tsingal account is considered to be active. In addition, see below under “Your Rights” for a description of your right of erasure.

We regularly assess the need for data retention in light of the applicable legislation. In addition, we take reasonable measures to ensure that the personal data in the register is not incompatible, obsolete or inaccurate considering the purpose of the processing. We rectify or delete such information without delay.

#### **Your Rights**

If you reside in the European Union or U.K., you have the right, subject to the conditions set out in the General Data Protection Regulation (GDPR) or U.K. Data Protection Act 2018 to request from Tsingal access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, the right to object to processing of your personal data, and the right to lodge a complaint with a supervisory authority. For more information about these rights, please visit the European Commission’s “My Rights” page relating to GDPR, which can be displayed in a number of languages. If you reside outside of the European Union and U.K., you may have similar rights under your local laws.

To request access to or rectification, portability or erasure of your personal data, or to delete your Tsingal account, visit Account Management Center or contact us via email.

NOTICE FOR CALIFORNIA RESIDENTS OF PRIVACY PRACTICES AND

## RIGHTS

If you are a California resident, California law may provide you with additional rights regarding your personal data. To learn more about your California privacy rights, visit the **CCPA Privacy Notice**: <https://oag.ca.gov/privacy/ccpa>

All trademarks are the property of their respective owners.

### Updates to our Privacy Policy

This Privacy Policy was updated on 25 September 2020. We will continue to review this notice and update our Privacy Policy with the latest information. We recommend that you regularly visit Tsingal websites and notice possible amendments to our privacy policy and review these privacy protection principles from time to time to ensure you are aware of any amendments made.