

RESONAI PRIVACY POLICY

Effective Date: 11/01/2021

1. Introduction

Resonai Inc. (“us”, “we” or “**Company**”) is committed to protecting the privacy of anyone who accesses, uses, or registers to our websites, apps or any other services we provide (collectively, the “**Services**”). We have published this Privacy Policy (“**Policy**”) to outline our practices with respect to collecting, using and disclosing your information when you use the Services. We encourage you to read the Privacy Policy carefully and use it to make informed decisions.

2. What Services do we offer?

To get a better sense on how, why, and from whom we collect data, it is useful to start with a brief overview of our Services. Resonai provides a platform that transforms physical properties into intelligent environments. This platform relies on a web-based application for remote properties management, which includes 3D visualization, access management, real-time data analytics and the ability to deploy mobile applications for engaging end-user experience.

Resonai offers its platform primarily to enterprises and business clients (“**Client(s)**”). These Clients integrate our platform into their infrastructures and services for various purposes. For example, they may use our platform for maintenance management, for example to receive real-time visualization of their building and to allow their tenants and employees to report maintenance issues directly through their mobile devices. Client's end users or services providers (technicians) may use our platform for indoor navigation purposes when visiting Client's infrastructures.

The data subjects from whom we may collect information include anyone who installs our app to make use of our Service, such as our Clients' prospective or existing customers, visitors to the Clients' properties, as well as the Client's tenants, employees, service providers, and anyone who installs our app (each, “**User**”).

3. What types of data we collect?

We collect two types of data from our Users: Personal Data (“**Personal Data**”) and non-Personal Data. This section explains the meaning of these data types and how we may collect them.

3.1. Personal Data

Personal Data means any information which may potentially allow your identification with reasonable means (for example, email address or name). We may collect your Personal Data in a few ways.

- When you communicate with us: for example, when you send us an email or contact us via our website, we collect the Personal Data you provided us with. This includes, for example, your name, company name, and email address.
- When you visit or use our website or app: we may use tracking technologies—such as cookies, JavaScript, beacons and Local Storage—to temporarily store data about your use of our Services. This data allows us to recognize you when you visit our Services and offer you, for example, tailored content and advertisements that better correspond with your interests. Section 5 below discusses our use of tracking technologies in greater details.

- When you register to our app: we collect the Personal Data you provided with us. This includes your name, email address, phone number, and real-time location. If you register through a social media network (i.e., if you log in via Facebook or Google), we may also receive certain details, such as your profile name, profile photo, and other social account details.
- When you use our Services: (i) location and route information. Location and route information may be collected, for example, in the form of GPS signals (combined with a time-stamp), IP address, and other information from sensors and receivers on or around your device, on which the app is installed and activated. (ii) Terms you searched; (iii) your views and interactions with content and ads (e.g., when you click on an ad); and (iv) information obtained from your camera when you use our Services.

3.2. Non-Personal Data

Non-Personal Data can be defined broadly as any information that does not relate to an identified or identifiable natural person. This may include your aggregated usage information and technical information transmitted by your device (e.g., the device you use, the type of browser and operating system your device uses, language preference, access time, etc.). We collect non-Personal Data in order to enhance the functionality of our Services.

4. Our use of permissions, cookies and tracking technologies

When you register to our Services, we request your permission to use your device's camera, location, storage, vibration control, and network access. Those permissions are essential for the functionality of our Services. You may either accept or deny those requests with this regard, however the functionality of the Services will be limited or denied, as the case may be.

When you visit or access our Services, we use (and authorize third parties to use) pixels, cookies, beacons and other technologies. Those allow us to automatically collect information about you, your device, and your online behavior, in order to enhance your navigation in our Services, improve our Services' performance, perform analytics, and customize your experience. To get a better sense on our use of cookies and tracking technologies, we discuss below some specific types of cookies that may be used.

4.1. Types of cookies

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website or app. Our website and app may use the following types of cookies.

- *Essential cookies*: essential cookies are automatically placed on your computer or device when you access our Services or take certain actions on our app or website. These cookies are essential to enable you to navigate around and use the features of our Services. We do not need to obtain your consent in order to use these cookies.
- *Functionality Cookies*: functionality cookies collect information about the choices you make (such as your user name, language, or the region you are in) and allows us to tailor our Services to you. For instance, by remembering your region, we may provide you with relevant language preferences. The information these cookies collect remains anonymous and they cannot track your browsing activity on other websites.
- *Performance cookies*: these cookies collect information about how you use our Services, for example which pages you go to most often, and record difficulties you may experience in doing so

(e.g., error messages). All information collected by these cookies is aggregated and therefore anonymous. It is only used to improve the efficiency of the website.

- *Targeting Cookies or advertising Cookies:* these cookies are used to deliver advertisements tailored to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operator's permission.

4.2. Analytical tools

To improve our services and get insights about the performance of our website and app, we may also use analytical tools, such as Google Analytics. Google Analytics collects information such as how often Users access the Service and what pages they visited. We use the information we get from Google Analytics only to improve our Service. Google Analytics collects the IP address assigned to you on the date you visit the Service, but it does not collect your name or other identifying information. We do not combine the information collected through the use of Google Analytics with Personal Data. Google's ability to use and share information collected by Google Analytics about your visits is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

4.3. How can you manage your cookies?

There are various ways in which you can manage and control your cookie settings. Below is a list of useful links that can guide you on how to do so. However, please remember that by deleting or blocking cookies, some of the features of the Services may not work properly or effectively.

- [Google Chrome](#)
- [Internet Explorer](#)
- [Mozilla Firefox](#)
- [Safari \(Desktop\)](#)
- [Safari \(Mobile\)](#)
- [Android Browser](#)

You can learn more and turn off certain third party targeting and advertising cookies by visiting the following third party webpages:

- [The Interactive Advertising Bureau \(US\)](#)
- [The Interactive Advertising Bureau \(EU\)](#)
- [European Interactive Digital Advertising Alliance \(EU\)](#)

5. Why do we collect your Personal Data?

Piracy laws require us to have a valid lawful basis in order to process your Personal Data. The lawful basis for processing are set out in Article 6 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"). This section explains for what purposes we may use your personal data and outlines the legal bases that underlie our usage.

Purpose	Legal basis
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<p>Provide our Services. We use your location, route information, and search query history to provide indoor navigation services (e.g., best route choices). In addition, we may use information collected from your camera during your use of our Services to understand your environment to further improve our navigation services.</p>	<p>The legal basis for processing this data are the performance of our contract with you and the protection of our legitimate interests. Our legitimate interests in this case are providing our Services.</p>
<p>Improve our Services. We use your Personal Data to ensure that our services are working as intended (e.g., that our navigation service is working properly), as well as to improve our Services (e.g., the accuracy of our navigation data).</p>	<p>The legal basis for processing this data are the performance of our contract with you and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>
<p>Tailor our Services. We use your Personal Data to tailor our Services to your interests and needs. For example, we may use your route history and information about common destinations where you used our app, to provide you with estimated time of arrival and suggest alternative routes.</p>	<p>The legal basis for processing this data are the performance of our contract with you and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>
<p>Test our Services. We use data that we collect from you for analytics. For instance, we may analyze data about your usage of our Services to optimize product design and measure the effectiveness of our Services.</p>	<p>The legal basis for processing this data are the performance of our contract with you and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>
<p>Consumer services. We use your Personal Data, such as your name and email address, for consumer services purposes. This includes, for example, responding to your inquiries.</p>	<p>The legal basis for processing this data are the performance of our contract with you; the compliance with our legal obligations; and the protection of our legitimate interests. Our legitimate interests in this case are improving our Services.</p>

<p>Marketing and Advertising. We may use your Personal Data to provide you with personalized advertisements when you visit our Services. If you do not want us to use or share your Personal Data for advertising or marketing purposes, you may opt out of certain cookies by following the instructions provided in section 5.</p>	<p>The legal basis for processing this data are your consent (when required); the compliance with our legal obligations; and protecting our legitimate interests. Our legitimate interests in this case are providing you with tailored services and advertisements that better correspond with your interests.</p>
<p>Compliance with the applicable laws. We may be required to collect, retain, or share your Personal Data under the applicable laws.</p>	<p>The legal basis for processing this data is compliance with our legal obligation.</p>

6. With whom we share your data?

We share your Personal Data as described below –

- *Service providers:* we share your information with service providers, such as cloud storage providers, analytics providers and advertisers, who help us provide you with our Services. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose.
- *Compliance with laws and law enforcement entities:* we may disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.
- *Merger and acquisitions:* we may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.
- *Clients:* we share -Personal Data with our Clients, relating only to the same Client's Users, in the context of the provision of our Services to our Clients, such as for the purpose of performing analytics.

7. Data Protection Rights

This section addresses the specific rights applying to residents of the EU or residents in other jurisdiction that afford the below rights.

7.1. Your rights

You may request to:

1. Receive confirmation as to whether or not Personal Data concerning you is being processed, and access your stored Personal Data, together with supplementary information.
2. Receive a copy of Personal Data you directly volunteer to us in a structured, commonly used and machine-readable format.
3. Request rectification of your Personal Data that is in our control.
4. Request erasure of your Personal Data.
5. Object to the processing of Personal Data by us.
6. Request to restrict processing of your Personal Data by us.
7. Lodge a complaint with a supervisory authority.

Please note that these rights are not absolute, and may be subject to our own legitimate interests and regulatory requirements. Users outside the EU are welcome to contact us for any questions or requests at the details below.

7.2. Transfer of data outside the EU

Any information that we collect (including your Personal Data) may be stored and processed in various jurisdictions around the world, for the purposes detailed in this Privacy Policy. However, we will only transfer your data to data recipients (i) located in the European Economic Area (the “**EEA**”), (ii) non-EEA countries which have been approved by the European Commission as providing adequate level of data protection, or (iii) countries entered into legal agreements ensuring an adequate level of data protection.

8. How we protect your data?

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your Personal Data. While we seek to protect your information to ensure that it is kept confidential, we cannot guarantee the security of any information. You should be aware that there is always some risk involved in transmitting information over the internet and that there is also some risk that others could find a way to thwart our security systems. Therefore, we encourage you to exercise discretion regarding the Personal Data you choose to disclose.

If you feel that your privacy was treated not in accordance with our Policy, or if any person attempted to abuse the Services or acted in an inappropriate manner, please contact us directly via our website or through the contact details available below.

9. Minors

We do not knowingly collect or solicit Personal Data from anyone under the age of consent (as determined under the applicable laws where the individual resides; “**Age of Consent**”). By accessing, using or interacting with our website, app, or Services, you certify to us that you are not under the Age of Consent.

In the event that we learn that we have collected Personal Data from an individual under the Age of Consent without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about an individual under the Age of Consent, then please contact us via our website or through the contact details available below.

10. Data retention

We will retain your Personal Data for as long as necessary to provide our services and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined to take into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. We will periodically review our data, and erase or anonymize it when you no longer need it.

11. Updates to this Privacy Policy

We reserve the right to change this Policy at any time. The most current version will always be posted on our website and app (as reflected in the "Last Updated" heading). You are advised to check for updates regularly. By continuing to access or use our Services after any revisions become effective, you agree to be bound by the updated Privacy Policy.

12. Contact information

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