

PRIVACY POLICY

Effective as of February 11, 2022

This privacy policy and cookies notice (our "Privacy Policy") applies to the GuideOn® mobile application (the "App") and our website, located at <https://guideonmilitary.com/home> (the "Site"), owned and operated by GA OneDot Solutions LLC ("Company," "we," "us," or "our").

We created this Privacy Policy to tell you what information the App and our Site may collect, how we use that information, and who we may share that information with, if at all. This Privacy Policy does not address the privacy practices of any third parties or third party applications that we do not own or control, or with whom we may be affiliated. By visiting or using our App or our Site, you agree to the terms of this Privacy Policy and the accompanying Terms of Use.

We acknowledge that many of our users may be current or former U.S. military personnel, family members of U.S. military personnel, or civilian contractors performing services on U.S. military installations. Our App strives to minimize the ability to identify your personal information as much as possible. However, because our App works together with third-party mapping and geolocation providers, we cannot warrant or guarantee that all of your personal information will remain anonymous. Certain details, such as geolocation information, may be shared with third-parties.

We encourage you to read the Privacy Policy, and to use the information it contains to help you make informed decisions.

1. **Personal Information.** For purposes of this Privacy Policy, the term "Personal Information" means any information that may identify, describe, relate to, be associated with (or be reasonably capable of being associated with) an individual. For example, Personal Information may include:
 - Your contact information (name, valid e-mail address, postal address, or phone number); or
 - Your billing information (credit card information, expiration date, and security code); or
 - Your IP address, geolocation, user identification (if you register for any Services), or any similar information.
2. **Information We Collect or Receive.** In the course of operating the App, we may collect or receive the following types of information. You authorize us to collect and receive such information.
 - (a) **Personal Information.** To use the basic features of the App, you are not required to provide us with your name, email address, mailing address, or any similar Personal Information about yourself. However, when using the App, you may be asked to provide, and we may collect, certain geolocation information (see Section 2(c), **Geolocation Information**, below). Except for geolocation information, we do not collect any Personal Information from you when you use the App unless you voluntarily provide us with the Personal Information (via the App, via email, or other means).
 - (b) **Third-Party Log In.** If you sign into or use the App via our Site, you are authorizing us to collect, store, and use, in accordance with this Privacy Policy, any and all information that you provided through the Site via our Application Programming Interface ("API") to the App. Such information may include, without limitation, your first and last name, a username, a unique identifier and access token, your e-mail address, and billing information (if applicable).
 - (c) **Geolocational Information.** Certain key features and functionalities of the App are based on your location. In order to provide these features and functionalities while you are using your mobile device, we may, with your consent, automatically collect geolocational information from your mobile device or wireless carrier and/or certain third-party service providers (collectively, "Geolocational Information"). Collection of such Geolocational Information occurs only when the App is running on your device. You

may decline to allow us to collect such Geolocational Information, in which case we will not be able to provide certain features or functionalities to you.

- (d) **Payment Information.** If you choose to make a purchase or subscribe to a feature or service of ours that requires a fee, you will be required to provide us with your payment information, including, without limitation, your name, bank account numbers, credit card or debit card numbers, account details, ACH information, and similar data (collectively, "Payment Information"). Such Payment Information will be collected and processed by our third-party payment vendors pursuant to the terms and conditions of their privacy policies and terms of use, and we do not obtain access to any Payment Information in connection with such purchases or subscriptions.
- (e) **Third-Party Analytics.** We may use third-party technology providers and third-party analytics services (for example, Google Analytics) to evaluate your use of the App, compile reports on activity, collect demographic data, analyze performance metrics, and collect and evaluate other information relating to the App and mobile and Internet usage. These third parties use cookies and other technologies to help analyze and provide us the data. You consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy. For more information on these third parties, including how to opt out from certain data collection, please visit their account profile and updating the settings. Please be advised that if you opt out of any such service, you may not be able to use the full functionality of the App.
- (f) **Other Information.** In addition to the Personal Information, Payment Information, and Geolocational Information, we may automatically collect or receive additional information regarding you and your use of the App; your interactions with us; and information regarding your computer and mobile devices used to access the App (collectively, the "Other Information"). Such Other Information may include:
 - (i) **From You.** Additional information about yourself that you voluntarily provide to us, such as your gender and your product and service preferences.
 - (ii) **From Your Activity.** We may collect or receive information regarding:
 - (A) IP address, which may consist of a static or dynamic IP address and will sometimes point to a specific identifiable computer or mobile device;
 - (B) browser type and language;
 - (C) referring and exit pages and URLs;
 - (D) date and time; and
 - (E) details regarding your activity on the App, such as search queries and other performance and usage data.
 - (iii) **About Your Mobile Device.** We may collect or receive information regarding:
 - (A) type of mobile device;
 - (B) advertising Identifier ("IDFA" or "AdID");
 - (C) operating system and version (e.g., iOS, Android or Windows);
 - (D) carrier; and
 - (E) network type (WiFi, 3G, 4G, LTE).
 - (iv) **From Cookies.** We may use both session cookies, which expire once you close the App, and persistent cookies, which stay on your mobile device until you delete them and other technologies to help us collect data and to enhance your experience with the App. Cookies are small text files an app can use to recognize a repeat visitor to the app. We may use cookies for various purposes, including to:

- (A) type of mobile device;
- (B) personalize your experience;
- (C) analyze which portions of the App are visited and used most frequently; and
- (D) measure and optimize advertising and promotional effectiveness.

If you do not want us to deploy cookies in the App, you can opt out by setting your mobile device to reject cookies. You can still use the App if you choose to disable cookies, although your ability to use some of the features may be affected.

- 3. Information Collected by Or Through Third-Party Companies.** Our App's functions and features work best when used in combination with a third-party mapping tool or mapping application. When using the App, you will be asked to select your preferred mapping tool or mapping application. We may share Other Information about your activity on the App with such third party mapping tool or mapping application to use features, for enhancement and optimization, for advertising, and for related purposes. These third parties may use cookies, pixel tags (also called web beacons or clear gifs), and/or other technologies to collect Other Information for such purposes. Pixel tags enable us and these third-party partners to recognize a browser's cookie when a browser visits the site on which the pixel tag is located in order to learn which what brings a user to a given site (such as advertisements or other means). In addition, we may receive Other Information from third-party providers such as advertising identifiers, IP addresses, and post-conversion data.

As of the effective date of this Privacy Policy, we do not rent, sell, or otherwise share your Personal Information with third-party advertisers other than the third-party providers of the mapping tool or mapping application selected by you in the App. However, we reserve the right to share Other Information with third party advertisers in the future.

- 4. How to Opt Out Of Third-Party Interest-Based Advertising.** If you wish to opt out of third-party interest-based advertising, please visit <http://www.networkadvertising.org> and <http://www.aboutads.info/choices> for details on how to do so. Additionally, users of mobile Devices can follow the below instructions:
- (a) **Android Users.** For Android devices with OS 2.2 and up and Google Play Services version 4.0 and up: Open your Google Settings app > Ads > Enable "Opt out of interest-based advertising."
 - (b) **iOS Users.**
 - (i) iOS 7 or Higher: Go to your Settings > Select Privacy > Select Advertising > Enable the "Limit Ad Tracking" setting.
 - (ii) iOS 6: Go to your Settings > Select General > Select About > Select Advertising > Enable the "Limit Ads Tracking" setting.

5. How Information Is Used and Shared.

- (a) You authorize us to use the Personal Information, Payment Information, Geolocational Information, and the Other Information (collectively, the "Information") to:
 - (i) provide and improve our App;
 - (ii) provide our services;
 - (iii) administer our promotional programs;
 - (iv) solicit your feedback; and

- (v) inform you about our products and services.
- (b) In order to provide our services and administer our promotional programs, we may share the Information with our third-party promotional and marketing partners, including, without limitation, businesses participating in our various programs.
- (c) We engage third-party companies and individuals to perform functions on our behalf. Examples may include providing technical assistance, customer service, marketing assistance, and administration of promotional programs. These other companies will have access to the Information only as necessary to perform their functions and to the extent permitted by law
- (d) In an ongoing effort to better understand our users, the App, and our products and services, we may analyze certain Information in anonymized and aggregate form to operate, maintain, manage, and improve the App and/or such products and services. This aggregate information does not identify you personally. We may share or license this aggregate data to our affiliates, agents, business and promotional partners, and other third parties. We may also disclose aggregated user statistics to describe the App and these products and services to current and prospective business partners and investors and to other third parties for other lawful purposes.
- (e) As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, the Information may be part of the transferred assets.
- (f) To the extent permitted by law, we may also disclose the Information:
 - (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or
 - (ii) whenever we believe that disclosing such Information is necessary or advisable, for example, to protect the rights, property, or safety of us or others, including you.

We will use your Payment Information to process your authorized payments through the App. We will share your Payment Information with a third-party service provider as necessary to process your payment. The third-party service provider stores your Payment Information; we do not store this information. Storage by the third-party service provider of your Payment Information is subject to the privacy policies and practices of the third-party service provider and is not subject to the terms of this Privacy Policy. By providing your Payment Information, you acknowledge and agree to use of such information by the third-party service provider for purposes of processing your payment to us.

- 6. Accessing and Modifying Information and Communication Preferences.** If you provided us any Personal Information, you may access, remove, review, or make changes to the same by contacting us as set forth below. In addition, you may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of any of our marketing e-mails. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases. You cannot opt out of receiving transactional e-mails related to the App (e.g., requests for support).

We may also deliver notifications to your mobile device (e.g., push notifications). You can disable these notifications by deleting the relevant service or by changing the settings on your mobile device.

- 7. How We Protect Your Information.** We take commercially reasonable steps to protect the Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such Information, nor can we guarantee that the Information you supply

will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

8. Important Notices to Non-U.S. Residents.

- (a) Use and Storage in the United States. The App and its servers are operated in the United States. If you are located outside of the United States, please be aware that your Information, including your Personal Information, may be transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction. If you are located outside the United States and choose to use the App, you hereby irrevocably and unconditionally consent to such transfer, processing, and use in the United States and elsewhere.
- (b) Residents of the EEA. To deliver the App’s services to you, it may be necessary for us to share your Personal Information outside the European Economic Area (the “EEA”). For example, if you are using the App:
- while on a U.S. military base or other approved U.S. military location within the EEA;
 - while you are located or residing in the EEA; or
 - with your and our service providers located outside the EEA.

These transfers are subject to special rules under European and UK data protection law. We intend to take reasonable efforts to ensure the transfer complies with applicable data protection law. Our standard practice is to ensure any third-party mapping tools or mapping applications that you authorize in the App (and that may collect your Geolocation Information or Other Information) comply with applicable data protection law, including use of, and compliance with, standard data protection contract clauses that have been approved by the European Commission.

- (c) Your Rights under the GDPR. Under European general data protection regulations and UK data protection law, if you reside in the EEA or the UK while using the App, you may be eligible to exercise additional rights with respect to your Personal Information. Your rights may include:

Right to Access	The right to be provided with a copy of your personal information (the right of access)
Right to Rectification	The right to require us to correct any mistakes in your personal information
Right to be Forgotten	The right to require us to delete your personal information—in certain situations
Right to Restriction of Processing	The right to require us to restrict processing of your personal information—in certain circumstances, e.g. if you contest the accuracy of the data
Right to Data Portability	The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
Right to Object	The right to object: <ul style="list-style-type: none"> — at any time to your personal information being processed for direct marketing (including profiling);

	— in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.
Right Not to be Subject to Automated Individual Decision-Making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

If you desire to exercise any of the rights indicated above, or if you have concerns about the way in which we have handled your information, please contact us (see **“How to Contact Us”** below) so that we can try to resolve the issue. If you are located in the EEA or the UK, you also have the right to lodge a complaint with the supervisory authority applicable in the jurisdiction in which the user is located, and with relevant judicial authorities.

- 9. App Stores; External Websites.** Your app store (e.g., iTunes or Google Play) may collect certain information in connection with your use of the App, such as Personal Information, Payment Information, Geolocational Information, and other usage-based data. We have no control over the collection of such information by a third-party app store, and any such collection or use will be subject to that third party’s applicable privacy policies.

The App may contain links to third-party websites. We have no control over the privacy practices or the content of these websites. As such, we are not responsible for the content or the privacy policies of those third-party websites. You should check the applicable third-party privacy policy and terms of use when visiting any other websites.

- 10. Children.** The App is not directed to children under the age of 13. We adhere to the Children’s Online Privacy Protection Act (COPPA) and will not knowingly collect Personal Information from any child under the age of 13. We ask that minors (under the age of 13) not use the App. If a child under the age of 13 has provided us with Personal Information, a parent or guardian of that child may contact us and request that such information be deleted from our records.

- 11. California Privacy Rights: Shine the Light Law.** Under California Civil Code Section 1798.83, California residents who have an established business relationship with us may choose to opt out of our sharing their contact information with third parties for direct marketing purposes. If you are a California resident and you wish to opt out, please send an e-mail to Katie@OneDotSolutions.com.

- 12. California Privacy Law: Do Not Track.** We do not monitor, recognize, or honor any opt-out or do not track mechanisms, including general web browser “Do Not Track” settings and/or signals.

- 13. Changes to This Privacy Policy.** This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time. Any such changes will be posted on the App and on our Site. By accessing the App or our Site after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of the Information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

14. How to Contact Us. If you have questions about this Privacy Policy, please e-mail us at Katie@OneDotSolutions.com with “Privacy Policy” in the subject line or mail us at the following address: 50 Waters Edge, Hollis, ME, 04042