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## **Royole Privacy Policy**

Last updated: April 3rd, 2018

This privacy policy (“Privacy Policy”) describes how Royole Corporation (“Royole”) collects, uses and protects the privacy and security of Personal Information of users of our website and mobile application (“Site”) and Services. Your access to, and use of, our Site and other Services is subject to the Royole Terms of Use [www.royole.com/support](http://www.royole.com/support) and related documents (each, the “Terms”). Subject to the provisions of applicable laws, any personal information you submit to Royole will not be used in any manner to which you have not consented. Any capitalized terms used but not defined in this Privacy Policy have the meanings given in the Terms.

By using the Site or Services, you consent to the collection and use of your personal information and certain non-personal information by Royole in accordance with this Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Site or Services. If we decide to change our Privacy Policy, we will advise you of the changes through postings on our Site, social media sites, email or push notifications. Policy changes will apply only to information collected after the date of the change.

Our Privacy Policy covers questions in the following areas among other topics: what kind of data we collect or receive through the Site or Services; how we collect and use your data; data sharing and security and the protection of the data of minors; scope of the Privacy Policy and its revision.

This Privacy Policy does not cover, supersede or affect the terms of any policy or agreement between you and any third party (such as, but not limited to, our third party credit card processors, Facebook, LinkedIn, content providers, and other parties with whom you share personal information). If you use any other services, you should make sure that you understand the privacy policies of those third party providers.

### **1. What kind of data do we collect and how do we use it?**

Personal information is information relating to an identified or identifiable individual, such as, but

not limited to, your name, address, e-mail address, phone number age, geo-location or other demographic information (“Personal Information”). “Personal Information” does not include information that is de-identified, aggregated or that cannot be reasonably associated with an identifiable individual.

#### **(a) Information you provide to us**

When you interact with Royole, you might be required to provide some Personal Information that is necessary for using our products and services. This Personal Information could be combined with other data to be used for improving our products and services.

The following are types of Personal Information that may be collected by Royole and examples of how we use it.

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i. Collection of Personal Information

- When you create a Royole account, purchase Royole products and Services, download and update Royole software, sign up on the Royole platform, participate in online surveys, or participate in other interactions with Royole, we could require you to provide Personal Information, including but not limited to your name, telephone number, email address, postal address, age, geo-location or other demographic information. You may, however, visit our Site without providing such personal information.
- When you purchase Royole products and Services, we will collect the related Personal Information, including but not limited to delivery address, credit card details, billing address and other financial information, and records of contact and communication.

ii. Use of Personal Information

Royole will strictly follow the contents of this Privacy Policy and its updates when using your Personal Information. Your Personal Information will only be used for the purposes that you confirmed and agreed to when it was collected. We will ask for your consent in advance if there is a need to use it for any other purpose.

The Personal Information we collect will be used when providing you with Royole products and services, processing your orders, or fulfilling your contract with Royole in order to ensure the functions and security of our products and services, to verify your identity, or to prevent and investigate fraud or other inappropriate situations.

The Personal Information that we collect will be used when communicating with you. For example, we may send you a notice when there is an update or release of Royole products or services, or contact you for other marketing related purposes.

The Personal Information that we collect will be used for personalized product design and for providing you with the applicable service.

If you participate in a drawing, contest, or similar promotional event held by Royole, we will use the Personal Information you have provided in these events for the purpose of the drawing, contest or similar promotional event.

Your mobile device user identification data, mobile device unique identifier, and geographical location can be used to activate your warranty repair service and specific software licenses, and it can also be used to invite you to participate in surveys. We will also use this information to improve our products and to analyze our business efficiency. However, we will not use this information to track your location.

**(b) Information we collect automatically**

For the purpose of operating and improving Royole's technologies and services, we will automatically collect and use information about you to help us provide a better user experience to

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you and to raise the quality of our services.

The following are types of information that may be collected by Royole automatically, along with examples of how we use it.

i. Automatic collection of information

When you create a Royole account, download and update Royole software, sign up on the Royole platform, participate in online surveys, or participate in other interactions with Royole, we may collect information such as your occupation, language, postal code, phone number, and the time zone in which Royole products will be used.

We may use IP addresses, MAC addresses, location information, and session identifiers to analyze trends, to administer our Site and Services, to track user activities, to infer user interests, and to otherwise induce, deduce, and gather information about individual users and market segments, including but not limited to geographic information. When you access Royole servers, our servers will automatically record certain types of log data. This server log data can include the following information: IP address, browser type, browser language, referral source page, operating system, date/time marker, and click stream data. When you experience an abnormal system exit or crash, we will collect information about your device's current environment to help you diagnose the problem.

We may collect your browser-type, operating system and other software or hardware information. In terms of information related to server-end records, when you use products such as the browser, Royole will collect information related to your server-end records, such as the data related to user actions such as uploading, downloading, syncing, and browsing.

We may collect information about searches and queries you perform, other users you interact with, subjects that you are studying and other related information.

We may link or combine your Personal Information with other information we get about your use of other services and from third parties to help understand you and your needs, and provide you with recommendations, better service and customized marketing.

We may use internal tools and third party applications and services (such as Google Analytics) to collect and analyze information. Please see Section 4 of this Privacy Policy for additional information on Google Analytics.

We may use "cookies" or similar technologies to enhance your experience and gather information about visitors and visits to our Site. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them.

We will also collect any information that you provide to us if you correspond with us or post any Content through the Services.

ii. Use of automatically collected information

The non-personably identifiable information that we collect in terms of language, postal code, and phone number can help us better understand user behavior and help us improve our products,

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services, and advertising.

We can use the statistical data we get through analysis of your activities on our Site or Services to continuously improve the operating experience and operational performance of our products and services and to fix problems and improve functional design.

The information that we collect through the use of cookies and other technologies (such as pixel tags) will be used to provide a better user experience and to raise our overall service quality. For example, by saving your language settings, we can provide you with service in your preferred language. We can use pixel tags to make sure emails are sent to users in a readable format and to tell us whether or not the email we sent has been opened. We can use this information to be able to send fewer emails to users or to not send email to users at all.

## **2. General Use of Information**

In addition to the uses described in Section 1 of this Privacy Policy, we may use any information we collect from you in the following ways:

- To personalize the Services and to allow us to deliver the type of content and product offerings that most interest you.
- To allow us to provide better service and respond to your customer service requests.
- To administer a promotion, survey or other Site or Services feature.
- To provide advertising relevant to you.
- To respond to subpoenas, search warrants, judicial proceedings, court orders, legal process, or other law enforcement measures, to establish or exercise our legal rights, or to defend against legal claims.
- To investigate, prevent, or take action regarding alleged or actual illegal activities, violations of the applicable Terms or Privacy Policy, or as otherwise required by law.
- We may also share information about you for any other purposes disclosed to you at the time we collect your information or with your consent.

Please keep in mind that any information that you post through our Services and make available to other users may become publicly available. All sharing of information and your content is done at your own risk, and you should use discretion in posting any personal information.

## **3. Data access and updating**

You can update your own personal data or ask us to delete your personal account unless there is a requirement to save this data due to legal reasons. When updating your personal data, we may require you to first verify your identity before processing your request.

We may refuse certain requests that are tediously repetitive, that require too many technical resources, that threaten the privacy of others, or that are very impractical.

We will provide this service to you free-of-charge as long as allowing you to access and revise the data does not occupy too many of our resources. We strive to improve and maintain our services to protect data from being accidentally or maliciously destroyed. Therefore, after you delete data

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from our server, we may not be able to immediately delete this data or its remaining copies from the server it is being used on, and we may not be able to delete the corresponding data from our backup systems.

#### **4. Information sharing**

Except where clearly stipulated elsewhere in this Privacy Policy, we generally do not sell, trade, or otherwise transfer to outside parties your Personal Information unless we provide you with advance notice. The term "outside parties" does not include our affiliates and any other parties who assist us in offering Services, conducting our business, or servicing you, so long as those parties agree to keep this information confidential.

You hereby authorize us to share your Personal Information with third parties without asking for your consent in the following situations:

- In the situation where it is required by law, legal proceedings, lawsuit, or the public and government authorities, we may share your Personal Information with the designated third parties.
- If we are involved in business transactions such as reorganization, merger, or sale, we may disclose your Personal Information to the transacting party for the purposes of the business transaction.
- As required by business needs or the protection of users, we may reasonably share a summary of non-personal data with the public or with partners in order to display the overall advantage of using our products or services.
- We may sometimes permit our authorized service providers to have access to aggregate statistics about our customers, sales, traffic patterns, usage and related information.
- Your information may be provided to other parties for marketing, advertising, or other uses.
- We also use Google Analytics to monitor activity on our Site. To learn how Google Analytics collects and processes data and to understand your opt-out options, please visit, "How Google uses data when you use our partners' sites or apps" available at: <http://www.google.com/policies/privacy/partners/>.

You may also use third-party content, games, apps, and other experiences through our Services. When doing so, the third parties who operate those features or services may be able to access information about you. For example, these third parties may be able to access (i) information in your Royole profile, (ii) information about your interactions with the third-party service, such as how long you have interacted with content or how far you have progressed in a game, and (iii) any other information you choose to share with the third party. Please note that any information shared with these (or other) third parties will be subject to those third parties' own privacy policies.

#### **5. Data security**

Royole follows generally accepted industry security standards to safeguard and help prevent DB2/ 31460937.3

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unauthorized access, maintain data security and correctly use your Personal Information. However, no commercial method of information transfer over the Internet or electronic data storage is known to be 100% secure. As a result, we cannot guarantee the absolute security of that information during its transmission or its storage in our systems.

## **6. Cookies, Online Advertising, Mobile Location Data, and other tracking technology**

Use of Cookies. We may use cookies or similar technologies. Cookies are small files that a website or its service provider transfers to your computer's hard drive through your browser (if you allow) that enables the website's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we may use cookies to help us remember items you have searched for in the past. Cookies can also help us understand your preferences based on previous or current site activity, which enables us to provide you with improved Services. We may also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future.

We may contract with third-party service providers to assist us in better understanding visitors to our Site and our subscribers. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser (such as Chrome, iOS, Mozilla Firefox or Internet Explorer) settings. Each browser is a little different, so look at your browser Help menu to learn the correct way to modify your cookies. If you turn cookies off, you may not have access to features that make your Site experience more efficient and some of our services may not function properly, and registered users may not be able to login properly.

Online advertising. If you prefer to not receive targeted advertising, you can opt out of some network advertising programs that use your information. These network advertising programs may allow you to view and manage the interest categories they have compiled from your online browsing activities. These interest categories help determine the types of targeted advertisements you may receive. To find out more, look for icons or other information displayed in the ads. To opt out of receiving interest-based advertising from third parties, click on both of the following links:

- [www.networkadvertising.org/choices/](http://www.networkadvertising.org/choices/)
- [www.aboutads.info/choices](http://www.aboutads.info/choices)

Mobile location information. When you use our website on your mobile device, you may choose not to share your location with us by adjusting the device's location services settings. For instructions on changing the relevant settings, please contact your plan provider or device manufacturer. For more information on opting out on mobile devices, you may also visit:

- [www.networkadvertising.org/mobile-choices](http://www.networkadvertising.org/mobile-choices)

Other Tracking Technology. We (and our third party service providers) may also use technologies such as beacons, scripts, tags and clear gifs. These technologies may be used to analyze trends, administer our Site, track users across the Site, and gather demographic information about our user

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base on the whole. We may receive reports based on the use of these technologies on an individual and aggregate basis.

## **7. How do we handle “do not track” signals?**

Some Internet browsers include the ability to transmit “Do Not Track” signals. Since uniform standards for “Do Not Track” signals have not yet been adopted, we do not process or respond to “Do Not Track” signals.

## **8. Protection of the data of minors**

### **Under Age 13**

We understand the importance of protecting children’s privacy in the interactive online world. The Site and Services are not designed for, or intentionally directed to, children thirteen (13) years of age or younger. It is not our policy to intentionally collect or maintain information about anyone under the age of thirteen (13). No one under the age of thirteen (13) is permitted to submit any Personal Information to Royole. If you learn that anyone under the age of thirteen (13) has submitted Personal Information to Royole, please contact us immediately.

### **Under Age 18**

Minors under 18 years of age may have the Personal Information and other posted content that they have provided to Royole while using this Site or the Services deleted by sending an email to [support@royole.com](mailto:support@royole.com) requesting deletion. Please note that, while we make reasonable efforts to comply with such requests, deletion of your personal information does not ensure complete and comprehensive removal of that data from all systems.

## **9. Scope of the Privacy Policy**

This Privacy Policy applies solely to information collected by our Site and Services. Our Privacy Policy is not applicable for third party products and/or services. Royole products and services may contain products and services of third parties, so when you use the third party products or accept third party services, they may be able to obtain your data. Therefore, we would like to remind you to read the privacy policies of these third party companies, as their policies govern their collection and use of your data. In an attempt to provide you with increased value, we may also include third party links on our Site, including third party advertising companies. These linked Sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these linked sites (including if a specific link does not work).

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## **10. Do you collect information from other sources?**

We may also supplement the information that we collect with information with other sources, such as page view information, credit history and similar information from credit bureaus and information that you may make available from social media such as Facebook and Twitter.

## **11. How do you ask questions and provide feedback?**

If you have questions about this Privacy Policy or any feedback, please contact our privacy team at [support@royole.com](mailto:support@royole.com).

## **12. Is my information transferred to other countries?**

It is important to note that the Site and Services are offered under United States law. If you are not in the United States, you understand and agree that we may transfer to and store your personal information in the United States, which—depending on where you are located—may not be viewed as having the same data protections as the country where you reside. We may transfer your information to other countries, which may have different data protections laws from the United States. By using the Site or Services and/or providing us with your visitor information, you consent to such transfers.

## **13. How do you correct or update personal information?**

You can correct or update your personal information by re-registering, updating your profile, or by contacting us by electronic-mail at [support@royole.com](mailto:support@royole.com) or sending a written request to:

Royole Corporation  
Attn: Support  
48025 Fremont Boulevard  
Fremont, CA. 94538

However, we will maintain copies of your information to the extent retained as part of our standard backup/archive process. In addition, these procedures will not remove any of your information that you have provided to other users or third parties, or that has been collected from you by third parties linked from the Site or Services.