

AUGX LABS, INC.

Privacy Policy

Last updated September __, 2022

AugX Labs, Inc. ("AugX," "we," or "us") respects your privacy and is committed to being transparent about our privacy practices. This Privacy Policy describes the types of information we may collect from you when you visit our website at [SITE] or any subdomain thereof, or visit or use our mobile or desktop applications, including any content or functionality offered on or through any of the foregoing (collectively, the "Site"), or when you access or use the online services we make available on the Site (collectively, the "Service"). This Privacy Policy also describes our practices for collecting, using, maintaining, protecting, and disclosing such information.

This Privacy Policy applies to information we collect on the Site, in email, text, or other electronic messages between you and the Site, and through your access to or use of the Service through the Site. Except as otherwise expressly set forth herein, it does not apply to information collected by us offline or through any other means, including on any other website operated by us or any third party, nor to information collected by any other third party, including through any application or content (including advertising) that may link to or be accessible from or on the Site or the Service.

Please read this Privacy Policy carefully before you start to use the Site or the Service to understand our policies and practices regarding how we treat your information. By accessing or using the Site or the Service in any manner, you accept and agree to be bound by this Privacy Policy. **If you do not agree with any terms of this Privacy Policy, you may not access or use the Site or the Service for any purpose.**

This Privacy Policy may change from time to time (see **Updates to Our Privacy Policy**, below). Your continued use of the Site or the Service after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Privacy of Children

The Site and the Service are not intended for or directed to children. No one under age 16 may provide any information to or on the Site or the Service. We do not knowingly collect or solicit personal information from children under age 16. If you are younger than 16 years of age, do not use or provide any information on the Site or through the Service or any of its features, register on, place orders or make purchases through, or use any of the interactive features of the Site or the Service, or provide any information about yourself to us, including your name, address, telephone number, email address, audio or visual recordings of yourself, or any screen name, user name, or any other identifier you may use. If we learn we have collected or received personal information from a child under age 16, we will delete that information. If you believe we might have any information from a child younger than 16 years of age, please contact us at [EMAIL].

Information We Collect

When you access the Site or use the Service, we collect certain information about you. This may include information by which you may be personally identified, such as your name, email address, mailing address, and/or visual or audio recordings of yourself, as well as information that is about you but may not specifically identify you, such as information about your internet connection, the device you use to access

the Site or Service, and usage details, IP addresses, and other information collected through certain tracking technologies (collectively "**personal information**").

Information You Provide Us

We collect personal information from various sources, such as directly from you when you access or use the Site or the Service. This may include:

- information that you provide by filling in forms on the Site or through the Service. This includes information provided at the time of registering to use the Site, subscribing to the Service, or requesting further information or services.
- information that you provide when you enter a contest or promotion sponsored by us, or when you report a problem with the Site or the Service.
- records and copies of your correspondence (including email addresses), if you contact us.
- your responses to surveys that we might ask you to complete for research purposes.
- details of transactions you carry out through the Site or the Service, including your purchase of any Service subscription or premium service. If you purchase a Service subscription or otherwise purchase access to other premium services or Service offerings, you may be required to provide financial information at the time you place the order through the Site.
- information you provide when submitting User Content (as defined below).
- your search queries on the Site.

You also may provide information, audio and/or visual materials, comments, and other content to be published or displayed (hereinafter, "**posted**") on public areas of the Service (collectively, "**User Content**"). Your User Content is posted at your own risk. We cannot control the actions of other users of the Site that may view your User Content. Please use caution when posting information publicly.

Information We Collect by Automatic Means

When you navigate through and interact with the Site, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- information about the devices you use to access the Site (such as the IP address and the type of the device, operating system, and web browser);
- dates, times, and duration of use of the Site (including whether you are a repeat or first time visitor);
- information on actions taken when using the Service (such as page views and website navigation patterns); and
- certain geolocational information.

In addition, we may use third-party web analytics services to help us understand your use of the Site and the popularity of certain content so we can improve your experience. For more information on our use of third-party analytics services, see **Third Party Providers** below.

Information we collect automatically may be statistical data that does not include personal information. We may maintain or associate any such statistical data with personal information we collect in other ways or receive from third parties. It helps us to estimate our audience size and usage patterns, speed up user experience, and improve and personalize the Service, including enabling us to identify and authenticate users. To the extent that we associate any of this non-personal information with your personal information, we will treat it as personal information under the terms of this Privacy Policy.

Technologies we use for automatic data collection may include cookies. A cookie is a small file placed on your smartphone or on the hard drive of your computer, as applicable. Portions of our Site and our emails may also contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and

single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity). For information on our use of cookies and how you can opt out, see **Your Choices**, below.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications on the Site are served by third parties, including content and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Site. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about any targeted content, you should contact the responsible provider directly.

How We Use the Information We Collect

We may use information we obtain about you, or that you provide to us:

- to provide you with our services;
- to process orders you place and to complete transactions you initiate through the Site;
- to provide you with information or materials you request;
- to respond to your questions and comments and provide customer support;
- to communicate with you about our products, services, offers, and promotions;
- to operate, evaluate, and improve our business and the products and services we offer;
- to analyze trends and statistics regarding use of the Site and the Service and activities supported by the same;
- to protect against and prevent fraud, unauthorized transactions, claims, and other liabilities, and manage risk exposure, including by identifying potential hackers and other unauthorized users;
- to enforce our Terms of Service and other agreements;
- to comply with applicable legal requirements and industry standards; and
- for any other purpose for which you provide your consent.

We may also use your information to contact you about, or display advertising with respect to, the Service and third parties' goods and services, including (without limitation) through providing you with AugX newsletters and other publications. If you do not want us to use your information in this way, please email [\[EMAIL\]](#). For more information, see **Your Choices**, below.

We may also use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

How We Share Your Personal Information

We may disclose aggregated information about our users, and information that does not identify any individual user, without restriction.

We may disclose personal information that we collect or you provide (as described in this Privacy Policy):

- to our subsidiaries and affiliates;
- to contractors, service providers, and other third parties we use to support our business (see **Third Party Providers**, below);
- to comply with any court order, law, or legal process, including to respond to any government or regulatory request;
- to enforce or apply our Terms of Service and other agreements;
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of AugX, users of the Site or Service, and/or others;
- for any other purpose which is incidental to the normal use of the Service; and
- for any other purpose for which you provide your consent.

We may also disclose personal information to third parties to market their products or services to you if you have not opted out of these disclosures. For more information, including on your rights to opt out of sharing your personal information with third parties for marketing purposes, see **Your Choices**, below.

We also reserve the right to transfer your personal and other information to a buyer or other transferee in the event of a merger, divestiture, restructuring, reorganization, dissolution, sale, or other transfer of some or all of our assets. Should such a sale, merger, or transfer occur, we will use reasonable efforts to direct the transferee to use your information in a manner that is consistent with our Privacy Policy.

Third Party Providers

Without limiting the foregoing, we may also employ or otherwise utilize third party companies and individuals to facilitate our Site and our provision of the Service, and to process data, perform Site-related services, or to assist us in analyzing how the Service is used (collectively, “**Third Party Providers**”). These Third Party Providers may have access to your personal information for purposes of performing these tasks on our behalf, and may have the right to retain and use personal information or other information through performance of these tasks on an aggregated and de-identified basis in accordance with the terms of the applicable Third Party Provider’s privacy policy. We advise you to review the privacy policies of the Third Party Providers, but note that we have no control over and assume no responsibility for the content, privacy policies or practices of any Third Party Providers, their websites or services.

Third Party Providers may include, but are not limited to, the following:

Analytics. We may use Third Party Providers to monitor and analyze the use of our Site.

- *Google Analytics.* Google Analytics is an independent web analytics service offered by Google that tracks and reports application traffic. Google uses the data collected to track and monitor the use of our Site. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. You can learn about Google’s privacy practices at <https://www.google.com/intl/en/policies/privacy>. You may opt out of the aggregation and analysis of data collected about you on our Site by Google Analytics by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/>. Please note that if you opt out, analytics companies other than Google Analytics may continue to aggregate and analyze data collected about you on the Site.

Other Service Providers. We also use Third Party Providers for marketing, technical, operational, payment processing, and other services, including as follows:

- Segment. We may use Segment to collect and manage data relating to Service users. You can learn more about Segment's privacy practices at <https://segment.com/legal/privacy/>.

Security

AugX takes protecting your information seriously, and has implemented reasonable measures to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. However, the safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to the Service or certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We urge you to be careful about giving out information in public areas of the Site or through interactions with other Service users. The information you share in public areas may be viewed by any user of the Service. Please use caution in determining what personal information to disclose.

Please note that the electronic transmission of information is not completely secure. We cannot guarantee that the security measures we have in place to safeguard information will never be defeated or fail, or that such measures will always be sufficient or effective. Any transmission of information is at your own risk.

Information and Data Transfers

The Service is administered by AugX in the United States. When we obtain information about you through your access to or use of the Site or the Service or when you input or import information to the Service from somewhere other than the United States, we may transfer, process, and store such information in the United States. If you access the Site and/or Service from outside the United States, you do so on your own initiative, at your sole risk, and you are responsible for compliance with all applicable laws. If you are a non-United States resident and provide us with your personal information, or if you use the Service, you consent to the transfer to and processing of such information in the United States, which may have data protection laws less stringent than those in the country in which you reside.

Your Choices

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Cookies. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Site and the Service may then be inaccessible or not function properly.

Disclosure of Your Information for Third-Party Advertising. If you do not want us to share your personal information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by sending us an email with your request to [EMAIL]. Some third party services may also permit opt-out through the settings of the relevant third-party platform.

Emails. AugX may send Service updates, Service notifications, promotional information (including, without limitation, AugX newsletters) and other communications to you via email. Promotional email communications will contain instructions describing how you can opt out of receiving future promotional emails from us. You may also email us at [EMAIL] to be removed from our mailing list. If you opt out of promotional emails, you may continue to receive non-promotional, transactional emails from us.

Targeted Advertising. If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending us an email with your request to [EMAIL].

Limiting Provided Information. You can choose not to provide us with certain information. If you decline to provide certain information, however, please note that some features of the Site and/or Service may then be inaccessible.

“Do Not Track” Requests

Some web browsers have a “Do Not Track” feature. This feature lets you tell websites you visit that you do not want to have your online activity tracked. These features are not yet uniform across browsers. The Site is not currently set up to respond to those signals.

Third Party Applications and Websites

The Site and/or Service may contain links enabling the electronic transfer of data from third-party applications to the Site or the Service, as well as links to third-party websites. AugX is not responsible for the privacy practices or content of these applications or websites, and linking to an application or website does not constitute endorsement by us of that application or website. You should review the privacy policy and terms and conditions of any such third-party application or website prior to using or providing information to the same.

Accessing and Correcting Your Information

You may send us an email at [EMAIL] to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Content, copies of your User Content or correspondence may remain viewable in cached and archived pages, or might have been copied or stored by other users. Proper access to and use of information provided on the Site and the Service, including User Content, is governed by our Terms of Service.

Your California Privacy Rights

California law grants additional privacy rights to California residents. In particular, the California Consumer Privacy Act (CCPA) requires businesses to disclose, for the past 12 months, (i) the categories of personal information collected, (ii) the sources of the collected personal information, (iii) the purposes for which the collected personal information is used, (iv) the categories of personal information disclosed for a business purpose, and (v) the categories of any personal information sold. AugX provides these disclosures in the following table. (Note that AugX does not sell any personal information, even under the broad CCPA definition of a “sale.”)

Category	Sources of Collection	Purposes of Collection	Disclosures for a Business Purpose
Identifiers	Site visits, creation of accounts and	For user registration, to enable AugX to provide its products and	To Third Party Providers to assist in providing AugX

	registration for AugX products and services	services and to allow AugX to communicate with you	products and services and processing associated payments
Personal information categories listed in the California Customer Records statute	Creation of accounts and registration to receive AugX products and services, submission of payment information	For user registration, to enable AugX to provide its products and services and to allow AugX to communicate with you	To Third Party Providers to assist in providing AugX products and services and processing payments
Protected classification characteristics under California or federal law	Creation of accounts and registration to receive AugX products and services; submission by users as part of User content	For user registration, to enable AugX to provide its products and services	To Third Party Providers to assist in providing AugX products and services
Commercial information	Registration for AugX products and services	To provide AugX products and services to users and maintain purchase history	To Third Party Providers to facilitate delivery of products and services
Internet or other electronic network activity	Your browsing and search history on our Site and Service and other interactions with our Site or Service	To improve the user experience on the Site, diagnose server problems and administer the Site, and to improve Service function	To Third Party Providers for the purpose of enhancing the Site and improving the effectiveness of our advertising

California residents also have the rights described below. We will not discriminate against any California resident who exercises these rights.

Right to access/know your information. You may request from us a list of (i) the personal information that we have collected about you, and (ii) the categories of third parties to whom we have disclosed your personal information. You have the right to up to two (2) access requests each twelve (12) months.

Right to delete your information. You may request, at any time, that we delete your information and direct our service providers to delete your information from their records.

You may contact us to exercise these rights at [EMAIL]. To ensure the privacy and protection of individuals, we are required to verify your identity (or that of your authorized agent) or otherwise authenticate your request(s), which we will do in accordance with the CCPA regulations. Please note that, under the CCPA, we are not required to grant a request to access/know or a request to delete with respect to personal information obtained from you in your role as an employee, owner, director, officer or contractor of a company and within the context of AugX providing its services to such company.

Your European and UK Privacy Rights

If you are a resident of the European Union or the UK, you are entitled to certain information and have certain rights under the General Data Protection Regulation (Regulation (EU) 2016/679) (the “**GDPR**”) or the UK GDPR adopted post Brexit (also referred to herein for convenience as simply the “**GDPR**”). Those rights include:

- the right of access to your information.
- the right to rectify your information if it is incorrect or incomplete.
- the right to have your information erased (“right to be forgotten”) if certain grounds are met.
- the right to withdraw your consent to our processing of your information at any time (if our processing is based on consent).
- the right to object to our processing of your information (if processing is based on legitimate interests).
- the right to object to our processing of your information for direct marketing purposes.
- the right to receive your information from us in a structured, commonly used and machine-readable format, and the right to transmit your information to another controller without hindrance from us (data portability).

If you are located in the European Union or the UK and you are or have been a user of our services (including the Service), we may send you marketing communications based on our legitimate interests, subject always to your right to opt out of such communications. Further, if you are located in the European Union, we will never share your information with a third party for such third party’s marketing purposes, unless you have specifically consented to us doing so.

You may contact us at [EMAIL] to exercise any of the above rights. We may request specific information from you to confirm your identity, and in some circumstances, we may charge a reasonable fee for access to your information.

Furthermore, if you believe that our processing of your information is inconsistent with your data protection rights under the GDPR and we have not adequately addressed your concerns, you have the right to lodge a complaint with the data protection supervisory authority of your country.

For purposes of the GDPR, we are a “controller” and you are a “data subject.”

Updates to Our Privacy Policy

AugX reserves the right to change this Privacy Policy at any time. If we make a material change to this Privacy Policy, we will communicate these changes to you either via email (if we have your email address) or by posting a notification on the Site. The date this Privacy Policy was last revised is at the top of this page. We encourage you to review this Privacy Policy periodically to check for any updates or changes.

Contact Us

If you have any questions about this Privacy Policy or our information practices, please email us at [EMAIL] or write to us at:

AugX Labs, Inc.

[ADDRESS]