

We are ProBrand International, Inc. (“ProBrand International”, “our”, “us” or “we”).

Your privacy is extremely important to us. This privacy policy (this “Privacy Policy”) describes how we collect, store, share, and use the information you submit and entrust to us when you visit and access our products, services, websites, and mobile applications (the “Applications”) that we make available to you in connection with products and services sold or otherwise provided to you as a part of our Internet of Things solutions (collectively, the “Products” and the “Services,” respectively). We license access to the Services to you under our Terms of Service (our “Terms of Service”) available at the Terms of Service link that you may find on your IoT-enabled devices, including, without limitation, mobile devices (collectively, your “Devices”).

#### 1. When and What information do we Collect?

When you visit or access the Applications or the Services, or purchase, download, activate, or register one or more of the Services with us, you may be prompted to provide (and we may collect) certain types of personally identifiable information (“PII”), such as your name, postal address, e-mail address, telephone number, and other unique information such as unique device identifiers, geo-location (with respect to Google Maps inclusion, also subject to Google’s Privacy Policy found at <http://www.google.com/policies/privacy>) and product and service preferences. We also may collect: (i) the e-mail address(es) of customers who communicate with us via e-mail or provide their e-mail address when joining our mailing list; (ii) PII that is voluntarily provided to us by individuals who use the Applications and/or the Services in connection with activities such as contest participations, surveys, and account registrations.

We may also collect information about you from commercially available sources. Such information may include, without limitation, your name, address, e-mail address, and demographic data. We may use the information that we collect from these sources, along with other information that we collect from you.

We may collect non-personally identifiable (anonymous) information from visitors to the Applications and/or the Services, regardless of whether they place an order with us, download software from us, volunteer such information to us, communicate with us, join our mailing list, or otherwise.

We may collect data collected through or from Devices in connection with your use of the Services, such as (without limitation):

Data collected by IoT sensors during monitoring, such as environmental data (temperature, humidity, etc.), security information (opened/closed doors and windows, smoke, motion, alarms triggered automatically or manually, etc.), and location information; and

Device information, such as model and serial number, network information (including, without limitation, IP address), device activity logs, operating system, service carrier, location, and historic and current device configuration.

Some of the Services may allow you to choose to invite other users to grant you access to their Devices, or permit other users the right to gain access to your Devices. We strongly discourage the sharing of log-in information, passwords, and other PII. In any case, we are not liable for the disclosure or use of any of your PII or other information on your Devices to other users through the use of the Services or for the alteration of and/or damage to a Device resulting from the sharing of such information.

Like many sites, the Applications use “cookies.” Cookies are small text files that reside on your computer and identify you as a unique user. Cookies allow us to, among other things, measure activity on the Applications and personalize your experience. For example, cookies enable us to remember your viewing preferences without requiring you to re-type a user name and password. If you choose, you can set your browser to reject cookies, or you can manually delete individual or all the cookies on your computer by following your browser’s help file directions. However, if you reject or delete cookies, you may have some trouble accessing and using some of the Services. We also use other common information-gathering tools such as web beacons and embedded web links.

We also use log files in order to track information such as internet protocol (IP) addresses, browser type, internet service provider (ISP), platform type, and date/time stamps. The log files may also contain information we gather that can be used in trend analysis, administration of the Applications, and overall demography tracking; this information is gathered through the counting of clicks and not linked to PII.

## 2. How is Information Used?

We use information we collect for the following purposes:

provide you with, and improve, the Products and the Services;

fulfill orders and process payments;

administer your account and back-up your data;

troubleshoot issues you encounter with the Products and/or the Services;

respond to your questions and concerns, and provide customer support;

contact you, and send you notifications about the Products and/or the Services according to your preferences;

send you marketing communications, as permitted by applicable law; and

analyze and better understand how users access and use the Products and/or the Services, both on an aggregated and individualized basis, in order to improve the Applications, the Products, create new features, provide you new offerings, respond to user preferences, and to protect your data.

Aggregate, anonymous data collected is statistical in nature and does not include PII. This data may be used for a variety of purposes, such as to improve our offerings, improve your user experience and the overall quality of the Applications, the Products and/or the Services, or for marketing, advertising, research, or similar purposes.

When you provide us with your credit card information, we may redirect that information to certain third parties only for the purpose of payment processing in accordance with their own privacy and security policies.

## 3. How is Information Shared?

Any third party with whom we share your information first agrees to receive, use, store, and disclose such information only in accordance with this Privacy Policy.

We may share your information with:

our corporate affiliates that provide aspects of the Services or otherwise support our provision of the Services;

reputable third-party vendors, service providers, contractors, or agents who perform aspects or functions of the Services on our behalf (e.g., help deliver the Services to you, maintain the Applications, store data, or perform data analytics); select business partners to facilitate their ability to offer products and services that we believe will be compelling to our customers and to those who have subscribed to our mailing list;

other third parties: (i) in order to respond to the requests of and/or provide information to police, other emergency responders, and governmental authorities; (ii) in order to comply with any law, regulation, subpoena, or court order; (iii) in order to help prevent fraud, enforce or protect our rights, protect your information, or enforce the Terms of Service and this Privacy Policy; (iv) in order to protect your personal safety and/or that of our employees, and/or third parties; and (v) for business reasons, such as in the context of the sale or merger of our company or business.

We may share your aggregated, anonymous data for a variety of purposes, such as to improve our offerings, improve your user experience and the overall quality of the Applications, the Products and/or the Services, or for marketing, advertising, research, or similar purposes.

We may also share your PII with third parties in certain circumstances when we receive your prior express consent to do so.

We may participate in behavioral-based advertising and use third-party service providers to serve ads on our behalf via the Services. Such providers may collect information about your visits to and use of the Services. They may use information about your visits and use of the Services to target advertisements for goods and services. This anonymous information is collected through the use of a pixel tag, which is industry-standard technology used by many major websites.

We also work with third parties to monitor certain pages of the Applications for the purpose of reporting traffic and other statistics. These third parties may use cookies and/or other monitoring technologies to compile anonymous statistics about the users of the Applications, the Products, and/or the Services. Some web browsers and devices permit you to broadcast a preference that you not be “tracked” online. At this time, we do not modify your experience based upon whether such a signal is broadcast.

#### 4. Third-Party Links

The Services may contain links to third-party websites and/or applications for your convenience and information. Certain of those websites and/or applications may allow you to enable their products and/or services to be directly integrated into your Device. We do not control those third parties or make any representations or warranties about them. Any personal information that is obtained by third parties is not covered by this Privacy Policy. We encourage you to review the privacy policies of third-party websites and applications you visit.

#### 5. How is Information We Collect Made Accessible to You?

The Services may contain links to third-party websites and/or applications for your convenience and information. Certain of those websites and/or applications may allow you to enable their products and/or services to be directly integrated into your Device. We do not control those third parties or make any representations or warranties about them. Any personal information that is obtained by third parties is not covered by this Privacy Policy. We encourage you to review the privacy policies of third-party websites and applications you visit.

## 6. Security

The security of your personal information is important to us. We follow generally accepted industry standards to protect the information transmitted to us, both during transmission and after our receipt. However, note that no method of transmission or electronic storage is 100% secure. Therefore, we cannot guarantee absolute security to your data. If you have any questions about the security of the Services, please contact us at [iot@pbgroup.com](mailto:iot@pbgroup.com)

The Following Applies to Individuals Whose Personal Data Falls Under the Jurisdictions Subject to the E.U.'s General Data Protection Regulation (GDPR): ProBrand International is the Data Controller for your personal data. Your consent to our use of the personal data provides ProBrand International with a lawful basis for such use. We will retain the personal data indefinitely unless you instruct us to delete it or we inform you otherwise. If you feel that there is a problem with how the personal data has been handled, you have the right to register a complaint with a supervisory authority.

## 7. Additional Information for users in the E.U. and countries with similar law

The following provision applies to individuals whose personal data (personal data is the term for PII in the E.U. and countries with similar laws) fall under the jurisdictions subject to the E.U.'s General Data Protection Regulation (GDPR):

Concerning our website operation, ProBrand International Inc. of 1900 West Oak Circle, Suite A, Marietta, GA 30062, USA is the Data Controller for your personal data. We decide how your data is processed in relation to the Services. Your consent to our use of the personal data provides ProBrand International with a lawful basis for such use. We will retain the personal data indefinitely unless you instruct us to delete it or we inform you otherwise. If you feel that there is a problem with how the personal data has been handled, you have the right to register a complaint with a supervisory authority in your location or region.

Under the GDPR, you have the following rights in addition to other rights and choices described under this Privacy Policy:

**Right of Access:** You may request access to your data at any time via your account and download any data therein.

**Right of Rectification:** In addition to the right of access, you can request to rectify any data we hold about that you think is incomplete or inaccurate. You can also do this via your account within the Applications.

**Right to object processing, delete, or stop using personal data:** Also known as the "right to be forgotten," this right gives you the ability to request the deletion of certain personal data about you. You may delete

any personal data within the Applications; however, this does not include data we are required to retain by applicable law (for example, where we are required to retain records of transactions for 5 years or more).

**Right to limit processing:** You may request that we limit the processing of certain data about you. You may ask us to restrict processing for reasons, such as (i) inaccuracy of data (ii) if we unlawfully process it but you do not want it deleted, or (iii) if the data is no more relevant, but you want us to retain it for legal claims.

**Right to object profiling:** Where we process certain data, you may request that we stop processing it. For example, where we send you newsletters or use your data for marketing, you may opt-out by following the instructions for unsubscribing in section 11 below.

**Right to portability:** You have the right to truly own your data and transfer it across services without affecting its validity. You may request to transfer, copy, or move your data from the Applications to another website or service in a safe and secure way.

#### 8. Additional Information for California Consumers (users)

In addition to other rights described under this Privacy Policy in relation to the Services, California consumers (users from the State of California) have the below rights under the California Consumer Privacy Act (CCPA/CPRA):

**Right to know about the personal information ProBrand International collected, shared, or sold** including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about the consumer : You may request that we disclose the categories of personal information (personal information is the term for PII under the CCPA/CPRA) we collected, shared, sold, or disclosed in the past 12 months.

**Right to request the deletion of personal information:** You may request the deletion of personal information at any time. This can be done via your account within the Applications. This right does not include any information we are required by applicable law to retain (for example, transaction data).

**Right to correct inaccurate data:** You may request ProBrand International to rectify inaccurate personal information that we maintain about you.

**Right to opt-out of the sale of personal information:** ProBrand International is not in the business of selling, renting, or disclosing personal information to third parties for their direct marketing goals. We will only disclose personal information to third party marketers upon your request.

**Right to Non-Discrimination:** ProBrand International shall not discriminate against you when you decide to exercise any of the rights above.

To exercise any of your rights above, don't hesitate to contact us by emailing [IOT@pbgroup.com](mailto:IOT@pbgroup.com). We will fulfill your request within 45 days of receiving your request. Some of these rights may be subject to limitations and qualifications, such as where fulfilling the request would conflict with federal, state, or local law, regulatory inquiries, subpoenas, or our ability to defend against legal claims. We will verify

your request using your email address. If you've created an account with us, we will also verify your request using the information associated with your account, including billing information.

Note that we cannot respond to your request if we cannot verify your identity and confirm the Personal Data related to you. Making a verifiable consumer request does not require you to create an account with us. If you wish to use an authorized agent to submit a request to opt-out on your behalf, you must provide the authorized agent with written permission signed by you. We may deny a request from an authorized agent if the agent cannot provide us with your signed authorization demonstrating that they have been authorized to act on your behalf.

## 9. Notification of Changes

ProBrand International reserves the right, in its sole discretion, to modify, amend or supplement this Privacy Policy at any time, with or without notice, by posting such modifications, amendments, and/or supplements here. If you continue to use the Services after any such modifications, amendments or supplements are made, you are then accepting and agreeing to be bound by them.

## 10. Other Rights & Important Notices

We do not knowingly collect PII from children under the age of 18 or allow them to purchase either Products or the Services from us.

Our business operations and the computer servers that handle data collected via the Services are hosted in data centers located in the United States, EU and APAC. Likewise, we may work with service providers outside these regions.

If you are accessing or using the Services in the E.U., EEA, or countries with similar laws whose privacy practices may differ from that of the U.S, then please note that your personal information may be transferred to the United States unless your agreement with ProBrand International specifies this data to remain exclusively in a specific region. If we transfer personal data from the E.U., EEA, and countries under the GDPR law, we rely on your approved practices, including using standard contract clauses approved by the European Commission or dealing with companies with “adequate” practices.

## 11. Opt-Out / Unsubscribe from Email Marketing

You can access some of the Applications without providing any PII. However, you may not be able to use certain features (such as registering, opening an account, or making purchases) without providing PII. Please contact us at [IOT@pbigroup.com](mailto:IOT@pbigroup.com) if you would like to discontinue receiving marketing-related e-mails and opt-out of certain uses of your PII by ProBrand International.

## 12. How to Contact Us

If you feel that we are not following this Privacy Policy, or to be removed from our mailing list, you may contact us at [IOT@pbigroup.com](mailto:IOT@pbigroup.com)