



Watteam Privacy Policy

Last Updated: February, 2017

This privacy policy (this “Policy”) describes the collection of personal information by Watteam Ltd. (“Watteam,” “we” or “us”) from users of Watteam’s Powerbeat meter product and its associated applications, sensors, website, widgets, software, tools, and other services provided by us and on which a link to this Policy is displayed (collectively, our “Service”). This Policy also describes our use and disclosure of such information. By using our Service, you consent to the collection, use, and disclosure of personal information in accordance with this Policy. This Policy is incorporated by reference into the Watteam Terms of Use and the Watteam End User License Agreement and subject to the provisions thereof.

Personal Information

“Personal Information,” as used in this Policy, is information that specifically identifies an individual, such as an individual’s name, address, telephone number, or e-mail address. Personal Information also includes information about an individual’s activities, such as information about his or her activity on our Service, and demographic information, such as date of birth, gender, geographic area, and preferences, when any of this information is linked to Personal Information that identifies that individual.

Personal Information does not include “aggregate” or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

Collection of Information

Collection of Voluntarily-Provided Information

We collect Personal Information that our users provide to us in a variety of ways on our Service. These include the following:

- **Location Information.** Access to certain features of the Service requires access to your location in order to tailor your experience with the Service based on your location (“Location-based Services”). When you use our software on your mobile device, we collect information about the location of your device such as GPS coordinates. For example, Watteam may access your location to track the route you are riding or correctly categorize your activities. We will ask you to opt-in to Location-based Services before we first access your location. You will be given the option to automatically enable the provision of some Location-based Services through the Watteam Powerbeat App (the “App”). You may enable or disable such Location-based Services at any time through the App’s Settings menu. In order to use certain Location-based

Services, you must enable certain features of your mobile phone, such as GPS, Wi-Fi, and Bluetooth, which enable us to identify your location through a variety of means, including GPS location, IP address, cell tower location, geofencing technology, or detection by physical on-location Wi-Fi or Bluetooth sensors, as available. To the extent your location is collected through GPS or Wi-Fi or Bluetooth sensors, such sensors, and the associated data services, may be provided by a third party, and you agree and acknowledge that such third party may access such information for the purpose of providing such data services to us. If you choose to disable any Location-based Services on your device and/or opt out of any Location-based Services through the App's Settings menu, you will not be able to utilize certain features of the Service. By enabling Location-based Services on your device, you agree and acknowledge that (1) device data we collect from you is directly relevant to your use of the Service, (2) we may provide Location-based Services related to and based on your then-current location, and (3) we may use any such information collected in connection with the provision of Location-based Services in connection with its provision of the Service and as otherwise provided for in this Privacy Policy.

- E-mail Newsletters. We may offer e-mail newsletters from time to time on our Service. If you sign up to receive a newsletter from us, we collect your e-mail address.
- User Accounts and Profiles. Our Service may give you the ability to register for an account or to create and update a user profile on the applicable Service. If we offer user account or profile functionality on the Service, we will collect the Personal Information that you provide to us in the course of registering for an account or creating or updating a user profile. This information may include, for example, name, postal address and zip code, telephone number, e-mail address, and related demographic information about you. We may indicate that some Personal Information (such as your zip code) is required for you to register for the account or to create the profile, while some is optional.
- Integrated Services. You may be given the option to access or register for the Service through the use of your user name and passwords for certain services provided by third parties (each an "Integrated Service"). By doing this, you authorize us to access and store the credentials you provide and your name. You should check your privacy settings on the Integrated Service to understand and change the information sent to us through that Integrated Service. Please review each Integrated Service's terms of use and privacy policies carefully before using their services and connecting to our Service.
- Interactive Features. Our Service may contain interactive functionality that allows you to engage with other users on the Service, post comments to forums, to upload photographs and other content (the "User Materials"), participate in surveys, and otherwise to interact with the Service and with other users. If you use any interactive functionality on our Service that request or



permit you to provide us with Personal Information (including, for example, any services that allow you to post User Materials on any of our Service), we collect the Personal Information that you provide to us in the course of using these interactive features.

- Correspondence. If you contact us by e-mail, using a contact form on the Service, or by mail, fax, or other means, we collect the Personal Information contained within, and associated with, your correspondence.
- Contests and Sweepstakes. We or our advertisers and other business partners may conduct or sponsor special contests, sweepstakes, and other promotions that users may enter or otherwise participate in on our Service. Certain of these promotions may be co-branded with one of our advertisers or other business partners. In these instances, the collection of your Personal Information may occur directly by the third-party partner on its website or other online service and may be shared with us. The promotion will state the privacy policy or policies governing the collection of such Personal Information.

Passive Information Collection

When you visit our Service, some information is collected automatically. For example, when you access our Service, we may automatically collect your browser's Internet Protocol (IP) address, your browser type, the nature of the device from which you are visiting the Service (e.g., a personal computer or a mobile device), the identifier for any handheld or mobile device that you may be using, the Web site that you visited immediately prior to accessing any Web-based Service, the actions you take on our Service, and the content, features, and activities that you access and participate in on our Service. We also may collect information regarding your interaction with e-mail messages, such as whether you opened, clicked on, or forwarded a message.

We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as "Web beacons"). We use passively-collected information to administer, operate, and improve the Website and our other services and systems, to improve the effectiveness of advertising on our Service, and to provide advertisements and other content that is tailored to you.

If we link or associate any information gathered through passive means with Personal Information, or if applicable laws require us to treat any information gathered through passive means as Personal Information, we treat the combined information as Personal Information under this Policy. Otherwise, we use and disclose information collected by passive means in aggregate form or otherwise in a non-personally identifiable form.

Please be aware that in the course of your use of the Service, websites or other services provided by third parties ("Third-Party Services"), including, for example, Google Analytics, may set cookies on your hard drive or use other means of passively collecting information about your use of the Service, Third-Party Services or other services or content.



To do this, they may use first-party cookies (which are set by the same domain your browser is receiving data from) or third-party cookies (which are set by a different domain). We also may make non-personally identifiable information available to Third-Party Services, and these Third-Party Services may collect such information, to assist such parties in understanding our users' activities and usage patterns on the Services. We do not have access to, or control over, the actions of Third-Party Services. Each provider of Third-Party Services uses information that it collects in accordance with its own privacy and security policies.

Information from Other Sources

We may receive information about you, including Personal Information, from third parties, and may combine this information with other Personal Information we maintain about you. If we do so, this Policy governs any combined information that we maintain in personally identifiable format.

Use of Personal Information

We use Personal Information to provide services and information that you request; to enhance, improve, operate, and maintain our Service, our programs, services, Web sites, and other systems; to prevent fraudulent use of our Service and other systems; to prevent or take action against activities that are, or may be, in violation of our Terms of Use, End User License Agreement or applicable law; to tailor advertisements, content, and other aspects of your experience on and in connection with the Service; to maintain a record of our dealings with you; for other administrative purposes; and for any other purposes that we may disclose to you at the point at which we request your Personal Information, and pursuant to your consent.

We may also use Personal Information you provide to contact you regarding products, services, and offers, both from ourselves and from third parties, that we believe you may find of interest. We allow you to opt-out from receiving marketing communications from us as described in the "Choice" section below.

We may use the location information that you provide for features of the service, such as tracking your cycling routes or other activities and providing personalized content or advertisements related to that activity. We may use your location information and other information we have about you, such as your current city, to personalize the Service to you.

Disclosure of Personal Information

Except as described in this Policy, we will not disclose your Personal Information that we collect on the Service to third parties without your consent. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:



Service Providers

We may disclose Personal Information to third-party service providers (e.g., payment processing and data storage and processing facilities) that assist us in our work. We limit the Personal Information provided to these service providers to that which is reasonably necessary for them to perform their functions, and we require them to agree to maintain the confidentiality of such Personal Information.

Business Transfers

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of our assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which Personal Information is transferred to one or more third parties as one of our business assets.

To Protect our Interests

We also disclose Personal Information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our Service and other users of the Service.

Integrated Services

The Service allows users to integrate accounts with Integrated Services. The third party operating the Integrated Service has access to your Personal Information for this purpose. The Service may also include functionality to enable automatic posting of certain actions you take through the Service to the Integrated Service, such as status updates. Such disclosures are made to the third party operating the Integrated Service subject to that third party's own terms and policies. Depending on your settings on the applicable Integrated Service, that information may be made available to other users of the third party users of the Integrated Service.

Location Information

We may disclose aggregate, non-personally identifiable location information to assist third parties, such as our partners and original equipment manufacturers, in understanding our users' interests, habits, and usage patterns.

Choice

If you receive commercial e-mail from us, you may unsubscribe at any time by following the instructions contained within the e-mail. You may also opt-out from receiving commercial e-mail from us, and any other promotional communications that we may send to you from time to time (e.g., by postal mail) by sending your request to us by e-mail at info@watteam.com or by writing to us at the address given at the end of this policy.



Additionally, if we offer user account functionality on the Service, we may allow you to view and modify settings relating to the nature and frequency of promotional communications that you receive from us.

Please be aware that if you opt-out of receiving commercial e-mail from us, it may take up to ten business days for us to process your opt-out request, and you may receive commercial e-mail from us during that period. Additionally, even after you opt-out from receiving commercial messages from us, you will continue to receive administrative messages from us regarding our Service.

Access

If we offer the ability to create user accounts or profiles on our Service, you may have the ability to access and update many categories of Personal Information that you provide to us by logging in to your account and accessing your account settings. If you wish to access or amend any other Personal Information we hold about you, you may contact us at info@watteam.com.

If you request that we delete your account on any of our Service (via a user settings page, by e-mail, or otherwise), we will do so within a reasonable period of time, but we may need to retain some of your Personal Information in order to satisfy our legal obligations, or where we reasonably believe that we have a legitimate reason to do so.

Links

The Service may contain links to other Web sites, products, or services that we do not own or operate. For example, the Service may contain links to third-party merchants from which users may purchase third party products that are advertised on the Service. The Service also may contain links to Third-Party Sites such as social networking services. If you choose to visit or use any Third-Party Sites or products or services available on or through such Third-Party Sites, please be aware that this Policy will not apply to your activities or any information you disclose while using those Third-Party Sites or any products or services available on or through such Third-Party Sites. We are not responsible for the privacy practices of these Third-Party Sites or any products or services on or through them. Additionally, please be aware that the Service may contain links to Web sites and services that we operate but that are governed by different privacy policies. We encourage you to carefully review the privacy policies applicable to any Web site or service you visit other than the Service before providing any Personal Information on them.

Children

Children's safety is important to us, and we encourage parents and guardians to take an active interest in the online activities of their children. Our Service is not directed to children under the age of 13, and we do not knowingly collect Personal Information from children under the age of 13 without obtaining parental consent. If we learn that we have collected Personal Information from a child under the age of 13 on our Service, we will delete



that information as quickly as possible. If you believe that we may have collected any such Personal Information on our Service, please notify us at info@watteam.com.

International Visitors

Our servers and data centers are located in the United States. If you choose to use the Service from outside the U.S., then you should know that you are transferring your Personal Information outside of your region and into the U.S. for storage and processing. By providing your Personal Information to us through your use of the Service, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, and operating the Service. You should know that each region can have its own privacy and data security laws, some of which may be less stringent as compared to those of your own region.

Security

We use reasonable security measures that are designed to protect Personal Information from accidental loss, disclosure, misuse, and destruction. These measures may include regular review of our data collection and storage processes, data encryption, and security software on our networks and servers. Please be aware, however, that no data security measures can be guaranteed to be completely effective. Consequently, we cannot ensure or warrant the security of any information that you provide to us. You transmit information to us at your own risk.

Updates to this Policy

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. Your continued use of our Service after such changes will be subject to the then-current policy. If we change this Policy in a manner that is materially less restrictive of our use or disclosure of your Personal Information, we will use reasonable efforts to notify you of the change and to obtain your consent prior to applying the change to any Personal Information that we collected from you prior to the date the change becomes effective. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose Personal Information.

“Do Not Track” Policy

The Service does not currently respond to a “do not track” or similar signal.

Contacting Us

If you have any questions or comments about this Policy, please contact us using the following contact information:



Watteam Ltd. Headquarters
17780 Fitch Avenue, Suite 111
Irvine, California 92604
info@watteam.com