

# Privacy Policy

Date of Last Revision: May 1, 2020

## Introduction

This Privacy Policy applies to data collection by Rave Mobile Safety, Inc. (“Rave Mobile Safety,” “we” or “us”) via Rave Mobile Safety-branded apps including Rave Alert (getrave.com) and the Rave Guardian mobile app (each, a “Site” and collectively the “Sites”) and shall apply to your use of the Sites and their capabilities and services (“Services”). This Privacy Policy excludes services that state that they are offered under a different privacy policy. This Privacy Policy governs the manner in which Rave Mobile Safety collects information from you (“User” or “you”) on the Sites.

Our Privacy Policy explains: (1) what information we collect and why we collect it; (2) how we use and share that information; (3) the choices we offer, including how to access and update information. Specifically, our Privacy Policy covers the following topics:

1. When This Privacy Policy Applies
2. Terms of Service
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Please familiarize yourself with our privacy practices and let us know if you have any questions. By using the Sites, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, please do not use the Sites.

Irrespective of which country you live in, you authorize us to transfer, store, and use your information in the United States and Canada, unless otherwise agreed upon between Rave Mobile Safety and your school or employer. The privacy and data protection laws and rules regarding when government authorities may access data may vary from those in the country where you live. Learn more about our data transfer

operations in the “International Transfer” section below. If you do not agree to the transfer, storage and use of your information in the countries where we operate, please do not use the Sites.

If you have any questions or comments about this Privacy Policy, please submit a request to [privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com).

## **When this Privacy Policy Applies**

Our Privacy Policy applies to the services offered by Rave Mobile Safety on the Sites and excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our services or Sites. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

## **Terms of Use**

By accessing or using the Sites in any manner, you also agree to be bound by Rave Mobile Safety's Terms of Use (the “Agreement”). Please read the Agreement carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the Agreement, please do not use the Sites.

## **Information We Collect**

We collect information, including personal data, to provide better services to all our Users. We use the term “Personal Data” to refer to any information that identifies or can be used to identify you. Common examples of personal data include: first and last name, address, email address, business email address, organization name, phone, digital identity such as a login name or handle, information about your device, and certain metadata.

“Sensitive Personal Data” refers to a smaller subset of personal data which is considered more sensitive to the individual, such as race and ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, genetic or biometric information, physical or mental health information, medical insurance data, or sexual orientation. Rave Mobile Safety does not collect or use Sensitive Personal Data through these Sites and asks that you do not provide Sensitive Personal Data to us.

We collect Personal Data in the following ways:

1. Information You Give to Us

When registering for our Services, you may choose to provide us with personal data such as your name, phone number, email address, address, and medical or household information. When using our Services, you may provide us with information sent between you and individuals authorized to administer our services. This information may include location and address information you elect to share with the

Services. You may also provide us with Personal Data about yourself when your report a problem or have a question about our Sites or services. Please note that if you do not provide us with Personal Data, your ability to use certain aspects of our products and services may be limited.

## 2. Information We Obtain from Your Use of Our Sites

We collect certain information automatically, such as your operating system version, browser type, and internet service provider. When you use our Sites, we automatically collect and store this information in service logs. This includes: details of how you used our Sites; Internet protocol address; and cookies that uniquely identify your browser. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Data, but we may maintain it or associate it with Personal Data we collect in other ways or receive from third parties.

## 3. Information our Customers May Give Us About You

Others buying our services for your use, such as your employer or your school, have the option to provide us with personal data and your eligibility to use the Services they purchased. The information provided by your employer or school may include your name, phone number, email address and address.

## 4. Cookies

We and our partners use cookies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device.

A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services. For more information about our use of cookies, including details on how to opt-out of certain cookies, please see our [Cookie Policy](#).

## **How We Use Information We Collect**

We use your personal data in ways that are compatible with the purposes for which it was collected or authorized by you, including for the following purposes:

1. To inform you about services available from Rave Mobile Safety;
2. To authorize access to our Sites and Services;
3. To provide you with Services;
4. To improve our customer service;
5. To respond to and support customers regarding their use of the Sites and Services;
6. To comply with all applicable legal requirements.
7. To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users.

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our Company and our customers.

We may use information collected from cookies and other technologies, to improve your user experience and the overall quality of our services. For example, by saving your language preferences, we'll be able to have our services appear in the language you prefer. We may use your personal information to see which web pages you visit at our Sites and we may then develop statistics that help us understand how our visitors use our Sites and how to improve them. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

## **Our Legal Basis for Collecting Personal Data**

Whenever we collect Personal Data from you, we may do so on the following legal bases:

1. Your consent to such collection and use;
2. Out of necessity for the performance of an agreement between us and you, such as your agreement to use our services and products;
3. Our legitimate business interest, including but not limited to the following circumstances where collecting or using Personal Data is necessary for:
  - Intra-company transfers for client data for administrative purposes;
  - Product development and enhancement, where the processing enables Rave Mobile Safety to enhance, modify, personalize, or otherwise improve our services and communications for the benefit of our customers, and to better understand how people interact with our Sites;
  - Fraud detection and prevention;
  - Enhancement of our cybersecurity, including improving the security of our network and information systems; and
  - General business operations and diligence;

Provided that, in each circumstance, we will weigh the necessity of our processing for the purpose against your privacy and confidentiality interests, including taking into account your reasonable expectations, the impact of processing, and any safeguards which are or could be put in place. In all circumstances, we will limit such processing for our legitimate business interest to what is necessary for its purposes.

## **Information We Share**

We do not share personal information collected through the Sites with companies, organizations and individuals outside of the Company unless one of the following circumstances applies:

1. **With your consent.** We will share personal data with companies, organizations or individuals outside of Rave Mobile Safety when we have your consent to do so.
2. **Enterprise accounts.** Your employer or school may offer you access to our Services. We will share personal data you provide with your employer or school. Your employer or school can review and manage your use of such enterprise Services.

- 3. For external processing.** We provide personal information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include communication service providers, Emergency Service Providers and public safety agencies. Specific examples of permitted disclosure of personal data include:
1. Your wireless phone number may be submitted to other service providers in order to locate the device during an emergency or transmit messages that you send or receive.
  2. In the event an emergency call or other direct communication is placed from your phone or device, and provided that the agency receiving the call uses our Services, your information may be displayed on the answering operator's workstation screen or to emergency responders.
  3. In the event a non-9-1-1 call is made to a public safety agency from your phone and is then routed into a 9-1-1 system, if the receiving 9-1-1 agency uses our Services, your information may be displayed on the 9-1-1 operator's workstation screen. In these situations, once information is passed to the local 9-1-1 authorities, we no longer have control over the transmission of the information. It may be conveyed verbally over an unsecured radio or transmitted in some other way to the responding emergency response team or others.
  4. In the event an Emergency Service Provider uses The Services database query tools, and your information includes an address within the querying Emergency Service Provider's jurisdiction, and a portion of your information matches the Emergency Service Provider's query criteria, and if you have elected to participate in this portion of the our Services, your information will be displayed in the search results presented to the Emergency Service Provider.

It is our policy to only share Personal Data with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites. We do not share personal information with third parties for their own marketing purposes.

- 4. For Legal Reasons.** We will share Personal Data with companies, organizations or individuals outside of Rave Mobile Safety if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
1. meet any applicable law, regulation, legal process or enforceable governmental request.
  2. enforce applicable Terms of Service, including investigation of potential violations.
  3. detect, prevent, or otherwise address fraud, security or technical issues.
  4. protect against harm to the rights, property or safety of Rave Mobile Safety, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their personal data when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- 5. Business Transfers.** As we continue to develop our business, we may buy, sell, or share assets in connection with, for example, a merger, acquisition, reorganization, sale of assets, or bankruptcy. In such transactions, Personal Data about our users is often a transferred business asset. In the event that Rave Mobile Safety itself or substantially all of our assets are acquired, Personal Data about our users may be one of the transferred assets.

- 6. Aggregate Site Use Information.** We may share aggregate and anonymized/pseudonymized Personal Data to advertisers and other third parties in order to promote or describe use of the Sites.

### **Your Failure to Provide Personal Data**

Your provision of Personal Data is required in order to use certain parts of our Sites and services. If you fail to provide such Personal Data, you may not be able to access and use our services on our Sites or parts of our services available via the Sites.

### **Our Retention of Your Personal Data**

We may retain your Personal Data for a period of time consistent with the original purpose for collection. For example, we keep your Personal Data for no longer than reasonably necessary for your use of our products and services and for a reasonable period of time afterward. We also may retain your Personal Data during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, maintain security, prevent fraud and abuse, and enforce our agreements.

If your account is removed from our sites and services, we generally delete account information within 30 days of account removal, except as noted below. We retain your Personal Data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Use, or fulfill your request to “unsubscribe” from further messages from us.

### **Your Choices and Accessing, Updating or Deleting Your Personal Data**

Whenever you use our services, we aim to provide you with choices about how we use your personal data. We also aim to provide you with access to your Personal Data. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of personal information we maintain about you or you may update or correct inaccuracies in that information through your Profile or Account, or by contacting us at [privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com). To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that personal information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

- **European Users’ Rights With Respect to Personal Data**

Some data protection laws, including the European Union’s General Data Protection Regulation (“GDPR”), provide you with certain rights in connection with Personal Data you have shared with us. If you are resident in the European Economic Area, you may have the following rights:

1. **The right to be informed:** You are entitled to be informed of the use of your Personal Data. This Privacy Policy provides such information to you.
2. **The right of access:** You have the right to request a copy of your Personal Data which we hold about you.
3. **The right of correction:** You have the right to request correction or changes of your Personal Data if it is found to be inaccurate or out of date.
4. **The right to be forgotten:** You have the right to request us, at any time, to delete your Personal Data from our servers and to erase your Personal Data when it is no longer necessary for us to retain such data. Note, however, that deletion of your Personal Data will likely impact your ability to use our services.
5. **The right to object (opt-out):** You have the right to opt-out of certain uses of your Personal Data, such as direct marketing, at any time.
6. **The right to data portability:** You have the right to a “portable” copy of your Personal Data that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your Personal Data stored on our servers / IT environment to another service provider’s servers / IT environment.
7. **The right to refuse to be subjected to automated decision making, including profiling:** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
8. **The right to lodge a complaint with a supervisory authority:** You may contact us using the contact information below, and we will consider your request in accordance with applicable laws.

- **Changing or Deleting Your Information**

You may update your information stored on the Sites at any time, as applicable to your Sites and Services:

1. Where you have been given access to the Sites and Services, you may update your information in the "My Profile", and/or "My Account" areas.
2. Where your organization provides your information on your behalf, you must contact the organization to access this information or request changes to your information.

You may also update or correct information about yourself by emailing us at [privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com). We may retain an archived copy of your records as required by law, to comply with our legal obligations, to resolve disputes, to enforce our agreements or for other legitimate business purposes.

We may contact you to request that you update your Personal Data on a regular basis to ensure its integrity for the purposes of ongoing data management.

- **Our Opt-in/Opt-out Policy**

By providing an email address or other contact information on the Rave Mobile Safety Sites, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a user to submit or receive information.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe from the service.
2. At any time, you can contact us through [privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com) or the address provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Data.
3. Where you have been given access to the Sites and Services, you may update your subscription settings in your account.
4. Where your organization may provide your information on your behalf, you must contact the organization to access this information or request changes to your information.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service-related notices.

### **Third Party Links**

The Sites may contain links to webpages operated by parties other than Rave Mobile Safety. We do not control such websites and are not responsible for their contents or the privacy policies or other practices of such websites. Our inclusion of links to such websites does not imply any endorsement of the material on such websites or any association with their operators. Further, it is up to the User to take precautions to ensure that whatever links the User selects or software the User downloads (whether from this Site or other websites) is free of such items as viruses, worms, trojan horses, defects and other items of a destructive nature. These websites and services may have their own privacy policies, which the User will be subject to upon linking to the third party's website. Rave Mobile Safety strongly recommends that each User review the third party's terms and policies.

### **International Transfer**

We are committed to complying with applicable laws, regulations and mandatory government standards regarding the protection of Personal Data.

Since we are a global organization, Personal Data and any additional information submitted may be used globally in connection with employment, business processes within Rave Mobile Safety, or communicating with our clients. Therefore, Personal Data may be transferred to other Rave Mobile Safety entities worldwide, where it will be processed in accordance with this Privacy Policy and laws that are applicable in each country. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

If we transfer your Personal Data out of your jurisdiction, we will implement suitable safeguards and rely on legally provided mechanisms to lawfully transfer data across borders to ensure that your Personal Data is protected.

## **How We Protect Personal Data**

Rave Mobile Safety maintains administrative, technical and physical safeguards designed to protect the User's Personal Data and information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use. We implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we use commercially reasonable security measures such as encryption, firewalls, and transport layer security (TLS) or hypertext transfer protocol secure (HTTPS) to protect Personal Data.

If Rave Mobile Safety collects account information for payment or credit, Rave Mobile Safety will use the information only to complete the task for which the account information was offered.

## **Children**

We do not intentionally collect any information about children under the age of 13 unless and until a relevant institution has provided consent and authorization for a child under the age of 13 to use the Sites or services and for us to collect information from such child. If you believe that we might have inadvertently collected personal information from a child under age 13 without proper consent, please contact us at [privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com). If we learn that we have inadvertently collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, without proper consent, we will take steps to delete the information as soon as possible.

## **Direct Marketing and “Do Not Track” Signals**

Rave Mobile Safety does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser may include controls to block and delete cookies, web beacons and similar technologies, to allow you to opt out of data collection through those technologies.

## **Privacy Rights of California Residents**

California residents are entitled under the California Consumer Privacy Act to contact us for various purposes, including to request information about whether we have disclosed personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their direct marketing purposes. California residents have the right to be informed as to what personal

information about them we may have, how we collected and may use that information and how to have it corrected or deleted, and may request further information about our compliance with this law by contacting us by one of the means listed in the “How to Contact Us” section below.

### **Changes to this Privacy Policy**

Our Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or products, email notification of privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

### **How to Contact Us**

If you have any specific questions about this Privacy Policy, you can contact us via email or phone, or by writing to us at the address below.

Rave Mobile Safety, Inc.  
Attn: Privacy Policy Inquiry  
492 Old Connecticut Path  
2<sup>nd</sup> Floor  
Framingham, MA 01701

Toll-free: 888-605-7164  
[privacy@ravemobilesafety.com](mailto:privacy@ravemobilesafety.com)