

## **Privacy Policy**

This Privacy Policy discloses the privacy practices for SPROKIT mobile app, web platform, and various related services (together referred to as “SPROKIT”). SPROKIT Inc., the provider of SPROKIT (referred to as “us” or “we”), is committed to protecting user privacy. Please read the information below to learn the following regarding your use of SPROKIT:

You acknowledge that this Privacy Policy is part of our Terms of Use, and by accessing or using SPROKIT, you agree to be bound by all of its terms and conditions. If you do not agree to these terms, please do not access or use SPROKIT.

We reserve the right to change this Privacy Policy at any time. Such changes, modifications, additions or deletions shall be effective immediately upon notice thereof, which may be given by means including, but not limited to issuing an e-mail to the e-mail address listed by registered users and posting the revised Policy on this page. You acknowledge and agree that it is your responsibility to maintain a valid e-mail address as a registered user, review SPROKIT and this Policy periodically and to be aware of any modifications. Your continued use of SPROKIT after such modifications will constitute your: (a) acknowledgment of the modified Policy; and (b) agreement to abide and be bound by the modified Policy.

### **1. What information do we collect from you?**

In order to better provide you with our numerous services, we collect two types of information about our users: Personally Identifiable Information and Non-Personally Identifiable Information. Our primary goal in collecting information from you is to provide you with a smooth, efficient, and customized experience while using SPROKIT.

**Personally Identifiable Information:** This refers to information that lets us know the specifics of who you are. When you register to use SPROKIT, we may ask you to provide certain personal information, such as your first and last name, mailing address, e-mail address, telephone number, and other personally-identifying information.

**Non-Personally Identifiable Information:** This refers to information that does not by itself identify a specific individual. We gather certain information about you based upon your use of SPROKIT in several ways. This information is compiled and analyzed on both a personal and an aggregated basis.

### **2. Where do we collect information from you and how do we use it?**

We do not collect any Personally Identifiable Information about you unless you voluntarily provide it to us. You provide certain Personally Identifiable Information to us when you:

- (a) register to use SPROKIT;
- (b) send messages, submit forms or transmit other communication;
- (c) complete certain scheduled activities and/or record that you have completed such an activity;

(c) initiate pinpoint geo-matching by checking in to a location (solely for the purpose of confirming the physical location of the mobile device from which you initiated the check-in, and solely at the time of the check-in).

We may also collect information from you at other points on SPROKIT that state that such information is being collected.

In addition, we may also collect certain Non-Personally Identifiable Information. This information is ultimately stored in the form of store categories. We may use an IP address or device identifier to diagnose problems with our servers, software, to administer SPROKIT and to gather non-personal demographic information.

We will solely use your Personally Identifiable Information to provide our services to you, as required by our agreements with you. We may use Personally Identifiable Information to deliver information to you and to contact you regarding administrative notices. We may also use Personally Identifiable Information to resolve disputes, troubleshoot problems and enforce our agreements with you, including our Terms of Use and this Private Policy.

We do not record any conversation through SPROKIT or track any user location (except for single-instance pinpoint geo-matching initiated by the user as described above). Third-party apps or sites accessible through SPROKIT may record audio or video. We do not control the recording functions of those apps or sites, nor do we access or store the audio or video data recorded through those apps or sites.

### **3. With whom do we share your information?**

We solely share Personally Identifiable Information with government agencies who are authorized to interact with and/or administer your case (such as your probation officer), for the sole purpose of providing our services. We do not otherwise share, or sell, trade, or rent your Personally Identifiable Information to others.

Other than as specified above, we may occasionally be required by law enforcement or judicial authorities to provide Personally Identifiable Information to the appropriate governmental authorities. We will disclose Personally Identifiable Information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

We may also provide Non-Personally Identifiable Information (in anonymized and aggregate form) about use patterns and related SPROKIT information to third parties for research purposes; however, these statistics do not include any Personally Identifiable Information.

### **4. How can you update or correct your Personally Identifiable Information?**

We believe you should have the ability to access and edit the Personally Identifiable Information that you have provided to us. You may change any of your Personally Identifiable Information in your account online at any time by linking to your account in accordance with instructions

posted elsewhere on SPROKIT. You may also access and correct your personal information and privacy preferences by writing us at:

SPROKIT Inc.  
256 Benton Ave.  
San Francisco, CA 94112

Please include your name, address, and/or e-mail address when you contact us.

We encourage you to promptly update your Personally Identifiable Information if it changes. You may ask to have the information on your account deleted or removed; however, because we keep track of past transactions, you cannot delete information associated with past transactions on SPROKIT. In addition, it may be impossible to completely delete your information without some residual information because of backups.

#### **5. What are your choices regarding collection, use, and distribution of your information?**

We may, from time to time, send you e-mail regarding our products and services. In addition, if you indicated upon registration that you are interested in receiving offers or information from us and/or our partners, we may occasionally send you direct mail about products and services that we feel may be of interest to you. Only SPROKIT Inc. (or agents working on behalf of SPROKIT Inc. and under confidentiality agreements) will send you these direct mailings and only if you indicated that you do not object to these offers. If you do not want to receive such mailings, simply tell us when you give us your personal information. Or, at any time you can easily edit your account information to no longer receive such offers and mailings.

In connection with the use of our website, you also have choices with respect to cookies, as described below. By modifying your browser preferences, you have the choice to accept all cookies, to be notified when a cookie is set, or to reject all cookies. If you choose to reject all cookies some parts of the website may not work properly in your case.

#### **6. What security precautions are in place to protect against the loss, misuse, or alteration of your information?**

At SPROKIT you can be assured that your Personally Identifiable Information is secure, consistent with current industry standards. The importance of security for all Personally Identifiable Information associated with our user is of utmost concern to us. Your Personally Identifiable Information is protected in several ways. Access by you to your Personally Identifiable Information is available through a password and unique customer ID selected by you. This password is encrypted. We recommend that you do not divulge your password to anyone. In addition, your Personally Identifiable Information resides on a secure server that only selected SPROKIT Inc. personnel and contractors have access to via password. We encrypt your Personally Identifiable Information and thereby prevent unauthorized parties from viewing such information when it is transmitted to us.

Personal information that you provide that is not Personally Identifiable Information also resides on a secure server and is only accessible via password. Since this information is not accessible

from outside SPROKIT Inc. you will not be asked to select a password in order to view or modify such information.

Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we strive to protect your Personally Identifiable Information, you acknowledge that: (a) there are security and privacy limitations of the internet and mobile data transmission which are beyond our control; (b) the security, integrity and privacy of any and all information and data exchanged between you and us through SPROKIT cannot be guaranteed; and (c) any such information and data may be viewed or tampered with in transit by a third party.

#### **7. Do we use “cookies”?**

When you use SPROKIT’s web portal, we will store cookies on your computer in order to facilitate and customize your use of SPROKIT. A cookie is a small data text file, which a Web SPROKIT stores on your computer's hard drive (if your Web browser permits) that can later be retrieved to identify you to us. Our cookies store randomly assigned user identification numbers, the country where you are located, and your first name to welcome you back to SPROKIT. The cookies make your use of SPROKIT easier, make SPROKIT run more smoothly and help us to maintain a secure SPROKIT. You are always free to decline our cookies if your browser permits, but some parts of SPROKIT may not work properly in that case.

#### **8. What should you know about privacy policies and data collection at any third-party sites or apps accessible from SPROKIT?**

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Other sites and/or applications accessible through SPROKIT have their own privacy policies and data collection, use and disclosure practices. Please consult each site or app’s privacy policy. We are not responsible for the policies or practices of third parties.

#### **9. What else should you know about your privacy online?**

You must be at least 18 years old to have our permission to use SPROKIT. Our policy is that we do not knowingly collect, use or disclose Personally Identifiable Information about users that are under 18 years of age.

You should also be aware that when Personally Identifiable Information is voluntarily disclosed (i.e. your name, e-mail address, etc.) in discussion forums or other public areas through SPROKIT, that information, along with any information disclosed in your communication, can be collected and used by third parties and may result in unsolicited messages from third parties. Such activities are beyond our control and this Policy does not apply to such information. Any submissions to chat rooms or other public areas on SPROKIT are accepted with the understanding that they are accessible to third parties. If you do not want your comments to be viewed by third parties, you are advised not to make any submissions. Ultimately, you are solely

responsible for maintaining the secrecy of your password and/or account information. Please be careful and responsible whenever online or using a mobile app.

If you have any questions about this Privacy Policy, the practices of SPROKIT, or your dealings with SPROKIT, please contact us by sending a letter to:

SPROKIT Inc.

Attn: Privacy Compliance Officer

256 Benton Ave.

San Francisco, CA 94112

You may also contact us by e-mail at [privacy@sprokit.net](mailto:privacy@sprokit.net).