

## SMARTSAPP PRIVACY AGREEMENT FOR USERS

Thank you for choosing to be part of our community at MineX 360 Services (“Company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy, or our practices with regards to your personal information, please contact us at [contact@minex360.com](mailto:contact@minex360.com).

When you visit our mobile or web application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this notice, we describe our privacy policy. We seek to explain to you what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully. If there are any terms in this privacy policy that you do not agree with, please contact your ward(s) school.

This privacy applies to all information collected through our mobile application, (“App”), and/or any related services, sales, marketing or event (we refer to them collectively in this privacy policy as the “Sites”).

### 1. WHAT INFORMATION DO WE COLLECT?

#### **Personal information you disclose to us**

We collect personal information that you voluntarily provided to us when registering at the Apps, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Apps (such as posting messages in our online forums or entering competitions, contests or giveaways) or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the App, the choice you make and the products and features you use. The personal information we collect can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and SmartSapp account access.

**Payment Data.** We do not collect your debit/credit card or any form of information. We re-route you to our partner banks payment platform anytime you need to make payments. All payment data is stored by our payment processor and you should review its privacy and contact the payment processor directly to respond to your questions.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

#### **Information automatically collected**

We automatically collect certain information when you visit, use or navigate the Apps. The information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system,

language preferences, referring URLs, device name, country, location maintain the security and operation of our Apps, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### **Information collected through our Apps**

If you use our Apps, we may also collect the following information:

- **Geo-Location Information.** We may request access or permission to track location-based information from your mobile device, either continuously or while you are using our mobile applications, to provide location-based services. If you wish to change our access or permission, you may do so in your device's settings.
- **Mobile Device Access.** We may request access or permission to certain features from your mobile device, including your mobile device's calendar, camera, microphone, contacts, storage and other features. If you wish to change our access or permissions, you may do so in your device's settings.
- **Mobile Device Data.** We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.
- **Push Notifications.** We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's/app's settings.

### **Information collected from other sources**

We may obtain information about you from other sources, such as public databases, joint marketing partners, as well as from other third parties. Examples of the information we receive from other sources include: social media profile information; marketing leads and search results and links, including paid listings (such as sponsored links).

## **2. HOW DO WE USE YOUR INFORMATION?**

We use personal information collected via our Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and logon** process with your Consent. If you choose to link your account with us to a third party account \*(such as your Google or Facebook account), we use the information we collect from those third parties to facilitate account creation and logon process.
- **To send you marketing and promotional communications** for Business Purposes and/or with your Consent. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS"

below).

- **To send administrative information to you for** Business Purposes, Legal reasons and/or possibly for Contractual. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions and policies.
- **Fulfill and manage your orders** for Contractual reasons. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Apps.
- **Request Feedback** for our Business Purposes and/or with your Consent. We may use your information to request feedback and to contact you about your use of our Apps.
- **To enable user-to-user communications** with your Consent. We may use your information in order to enable user-to-user communications with each user's consent.
- **To enforce our terms, conditions and policies** for Business Purposes, Legal Reasons and/or possible Contractual.
- **To respond to legal request and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how we respond.
- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Apps, products, services, marketing and your experience.

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **With Your Consent.** We may disclose your personal information for any other purposes with your consent.

### **4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

### **5. DO WE USE GOOGLE MAPS?**

All websites, mobile application, or Facebook application uses Google Maps APIs. By using our Maps API Implementation, you agree to be bound by Google's Terms of Service. You agree to allow us to obtain or cache your location. You may revoke your consent at any time. We use information about location in conjunction with data from other data providers.

#### **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

We only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose of this policy will require us keeping information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

#### **7. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Apps is at your own risk. You should only access the services in a secure environment.

#### **8. DO WE COLLECT INFORMATION FROM MINORS?**

We do not knowingly solicit data from or market to children under 18 years of age. By using the Apps, you represent that you are at least 18 years or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under 18, please contact us at [contact@minex360.com](mailto:contact@minex360.com).

#### **9. WHAT ARE YOUR PRIVACY RIGHTS?**

##### **Account Information**

If you would at anytime like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.

Upon your request to terminate your account, you will need to communicate with your ward(s) school for advice.

**Opting out of email marketing:** You can unsubscribe from our marketing email at anytime by clicking on the unsubscribe link in the emails that we send you. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Access your account settings and update preferences

#### **10. DO WE MAKE UPDATES TO THIS POLICY?**

We may update this policy from time to time without notice. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to the privacy policy, we may or may not notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.