

HotSpotMe Privacy Policy

Effective Date: June 1, 2019

The following information is collected by or on behalf of HotSpotMe:

User profile: We collect information when you create or update your HotSpotMe account. This may include your name, email, phone number, login name and password, address, payment or banking information (including related payment verification information), government identification numbers if required by law, birth date, photo and signature. Also, wireless router and mobile hotspot information for hosts. This also includes the preferences and settings that you enable for your HotSpotMe account.

Demographic data: We may collect demographic information about you, including through user surveys. In some countries, we may also receive demographic information about you from third parties.

User content: We may collect information that you submit when you contact HotSpotMe customer support, or otherwise contact HotSpotMe.

Location information: Depending on the HotSpotMe services that you use, and your app settings or device permissions, we may collect your precise or approximate location information as determined through data such as GPS, IP address and Wi-Fi. If you are a HotSpotMe Host, we collect location information of your wireless router or mobile hotspot.

Transaction information: We collect transaction details related to your use of our services, including the type of services you requested or provided, your transaction details, date and time the service was provided, amount charged, duration of use, and payment method. Additionally, if someone uses your promotion code, we may associate your name with that person.

Usage information: We collect information about how you interact with our services. This includes information such as access dates and times, app features or pages viewed, app crashes and other system activity. In some cases, we collect this information through cookies, pixel tags, and similar technologies that create and maintain unique identifiers.

Device information: We may collect information about the devices you use to access our services, including the hardware models, device IP address, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, passphrases, advertising identifiers, serial numbers, device motion information, and mobile network information.

Information from other sources may include:

Users providing your information in connection with referral programs.

Users or others providing information in connection with claims or disputes.

HotSpotMe business partners through which you create or access your HotSpotMe account, such as payment providers, social media services, or apps or websites who use HotSpotMe's APIs or whose API HotSpotMe uses (such as when you view available hotspots through Google Maps).

Publicly available sources.

Marketing service providers.

HotSpotMe may combine the information collected from these sources with other information in its possession.

HotSpotMe uses the information we collect to provide, personalize, maintain, improve, and secure our products and services. This includes using the information to:

Create and update your account.

Verify your identity.

Enable connection to private wireless routers and mobile hotspots.

Process or facilitate payments for the Services.

Enable features that allow you to share information with other people, such as when you refer a friend to HotSpotMe.

Enable features to personalize your HotSpotMe account, such as enabling quick access to previous connections.

Perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

Using device, location, profile, usage and other information to prevent, detect, and combat fraud or unsafe activities. This may also include information from third parties.

Monitor and improve our customer support responses.

We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, and develop new features and products in connection with our services.

HotSpotMe may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events.

We may use the information we collect to investigate or address claims or disputes relating to your use of HotSpotMe's services, or as otherwise allowed by applicable law, or as requested by regulators, government entities, and official inquiries.

Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. HotSpotMe uses cookies and similar technologies for purposes such as:

Authenticating users, remembering user preferences and settings, determining the popularity of content, and delivering and measuring the effectiveness of advertising campaigns.

Analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services.

HotSpotMe may share the information we collect with other users:

For example, if you are a host, we may share your router or hotspot's network name and location. We will NOT share your personal information with other HotSpotMe users.

HotSpotMe may share the information we collect at your request:

For example, if you requested a service through a partnership or promotional offering made by a third party, HotSpotMe may share your information with those third parties. This may include, for example, other apps or websites that integrate with our APIs, or services, or those with an API or service with which we integrate, or business partners with whom HotSpotMe may partner with to deliver a promotion, a contest or a specialized service.

We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf. For example, HotSpotMe processes and stores information in the United States on behalf of its international subsidiaries and affiliates.

HotSpotMe may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. This may include, for example:

Payment processors and facilitators.

Cloud storage providers.

Marketing partners and marketing platform providers.

Data analytics providers.

Research partners, including those performing surveys or research projects in partnership with HotSpotMe or on HotSpotMe's behalf.

Vendors that assist HotSpotMe to enhance the safety and security of its apps.

Consultants, lawyers, accountants and other professional service providers.

HotSpotMe may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request, or where the disclosure is otherwise appropriate due to safety or similar concerns.

This includes sharing your information with law enforcement officials, government authorities, or other third parties as necessary to enforce our Terms of Use, or other policies, to protect HotSpotMe's rights or property or the rights, safety or property of others, or in the event of a claim or dispute relating to your use of our services. If you use another person's credit card, we may be required by law to share information with that credit card holder.

This also includes sharing your information with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

HotSpotMe may share your information other than as described in this policy if we notify you and you consent to the sharing.

HotSpotMe requires user profile information in order to provide its services, and retains such information for as long you maintain your HotSpotMe account.

HotSpotMe retains certain information, including transaction, location, device and usage information, for a minimum of 7 years in connection with regulatory, tax, insurance and other requirements in the places in which it operates. Once such information is no longer necessary to provide HotSpotMe's services, enable customer support, enhance the user experience or other operational purposes, HotSpotMe takes steps to prevent access to or use of such information for any purpose other than compliance with these requirements or for purposes of safety, security and fraud prevention and detection.

You may request deletion of your account at any time by sending an email to support@hotspotme.io.

Following such request, HotSpotMe deletes the information that it is not required to retain. In certain circumstances, HotSpotMe may be unable to delete your account, such as if there is an outstanding credit on your account or an unresolved claim or dispute. Upon resolution of the issue preventing deletion, HotSpotMe will delete your account as described above.

HotSpotMe may also retain certain information necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if HotSpotMe shuts down a user's account because of unsafe behavior or security incidents, HotSpotMe may

retain certain information about that account to prevent that user from opening a new HotSpotMe account in the future.

Most mobile platforms (iOS, Android, etc.) have defined certain types of device data that apps cannot access without your consent. And these platforms have different permission systems for obtaining your consent. The iOS platform will alert you the first time the HotSpotMe app wants permission to access certain types of data and will let you consent (or not consent) to that request. Android devices will notify you of the permissions that the HotSpotMe app seeks before you first use the app, and your use of the app constitutes your consent.

You may request that HotSpotMe:

Provide a detailed explanation regarding the information HotSpotMe has collected about you and how it uses that information.

Receive a copy of the information HotSpotMe has collected about you.

Request correction of any inaccurate information that HotSpotMe has about you.

You can make these requests by contacting HotSpotMe at support@hotspotme.io.

You can also edit the information associated with your account through the HotSpotMe app and website. And, you can look up your transaction history through the HotSpotMe app and website.

You may opt out of receiving promotional emails from HotSpotMe by emailing us at support@hotspotme.io. You may also opt out of receiving emails and other messages from HotSpotMe by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages, such as receipts for your transactions or information about your account.

We may occasionally update this policy. If we make significant changes, we will notify you of the changes through the HotSpotMe app or through other means, such as email. To the extent permitted under applicable law, by using our services after such notice, you consent to our updates to this policy.

We encourage you to periodically review this policy for the latest information on our privacy practices. We will also make prior versions of our privacy policies available for review.

Special Information for EU Users

Beginning May 25, 2018, the processing of personal data of users in the European Union is subject to the EU General Data Protection Regulation ('GDPR'). This section provides information as relates to EU users' rights, and HotSpotMe's responsibilities, under this regulation.

1. EU User Rights

If you are a HotSpotMe user in the EU, you have the following rights with respect to HotSpotMe's handling of your personal information. To exercise these rights, please see below.

Users outside the EU may also request explanation, correction, deletion or copies of their personal data.

a. Explanation and copies of your data

You have the right to request an explanation of the information that HotSpotMe has about you and how HotSpotMe uses that information.

You also have the right to receive a copy of the information that HotSpotMe collects about you if collected on the basis of consent or because HotSpotMe requires the information to provide the services that you request.

b. Correction

If HotSpotMe has information about you that you believe is inaccurate, you have the right to request correction of your information.

c. Deletion

Users may request deletion of their accounts at any time. We may retain certain information about you as required by law and for legitimate business purposes permitted by law.

d. Objections and complaints

Users in the EU have the right to object to HotSpotMe's processing of personal data, including for marketing purposes based on profiling and/or automated decision making. HotSpotMe may continue to process your information notwithstanding the objection to the extent permitted under GDPR.

Users in the EU also have the right to file a complaint relating to HotSpotMe's handling of your personal information with the Data Protection Authority of their home country.

You may also submit questions, comments or complaints to HotSpotMe's Data Protection Officer.

2. Grounds for Processing

The GDPR requires that companies processing the personal data of EU users do so on the basis of specific legal grounds. As described below, HotSpotMe processes the information of EU users based on one or more of the grounds specified under the GDPR:

a. The processing is necessary to provide the services and features you request

HotSpotMe must collect and use certain information in order to provide its services. This includes:

User profile information that is necessary to establish and maintain your account, including to verify your identity; enable communications with you about your transactions, orders and accounts; and to enable you to make payments or receive payouts.

Hotspot location information, which is necessary to match users with Hosts, and to provide a map of available hotspots.

Transaction information, which is necessary to generate and maintain in connection with your use of HotSpotMe's services.

Usage information, which is necessary to maintain, optimize and enhance HotSpotMe's services, including to determine, sometimes in combination with other information, incentives, connect users and Hosts, and calculate transactions costs.

Collection and use of this information is a requirement for using HotSpotMe's apps.

b. The processing is necessary to protect the vital interests of our users or of others

HotSpotMe may process personal information, including disclosing data with law enforcement authorities in case of threats to the safety of users or of others.

c. The processing is necessary for HotSpotMe's legitimate interests

HotSpotMe collects and uses personal information to the extent necessary for its legitimate interests. This includes collecting and using information:

To maintain and enhance our users' safety and security. For example, we use personal information to prevent use of our services by users who have engaged in inappropriate or dangerous behavior, such as by retaining information of banned users to prevent their use of HotSpotMe's apps.

To prevent, detect and combat fraud in connection with the use of our services. For example, HotSpotMe uses user profile, location, device and usage information, to identify and prevent circumstances when users attempt to defraud HotSpotMe or other users.

To inform law enforcement officials regarding criminal acts or threats to public safety.

To provide customer support.

To optimize our service and develop new services. This includes, for example, recommending (new) features, improving the hotspot map, and enhancing pricing.

For research and analytical purposes. This includes, for example, analyzing usage trends to improve the user experience and enhance the safety and security of our services.

For direct marketing purposes. This includes, for example, analyzing data to identify trends and tailor marketing messages to user needs.

To enforce HotSpotMe's Terms of Use.

d. The processing is necessary for the legitimate interests of other persons or parties

HotSpotMe collects and uses personal information to the extent necessary for the interests of other persons or the general public. This includes sharing information in connection with legal or insurance claims, to protect the rights and safety of others.

HotSpotMe may also process personal information when necessary in regards to a substantial public interest, on the basis of applicable laws.

e. The processing is necessary to fulfill HotSpotMe's legal obligations

HotSpotMe is subject to legal requirements in the jurisdictions in which it operates that require us to collect, process, disclose, and retain your personal data. For example, HotSpotMe is subject to laws and regulations in many cities and countries that require it to collect and retain information about your transactions, to retain such information for extended periods of time, and to provide copies of such information to governmental or other authorities. HotSpotMe uses your information to comply with such laws to the extent they apply to your use of the HotSpotMe apps.

HotSpotMe may also share information with law enforcement, or requests by third parties pursuant to legal processes.

f. Consent

HotSpotMe may collect and use your information on the basis of your consent. You may revoke your consent at any time. If you revoke your consent, you will not be able to use any service or feature that requires collection or use of the information we collected or used on the basis of consent.

HotSpotMe relies on consent in connection with data collections or uses that are necessary to enhance the user experience, to enable optional services or features, or to communicate with you. If you are an EU user, the following types of data collections or uses are done on the basis of your consent.

Location information

Notifications

Accessibility features

Please see above for further information about these data collections and uses, how to opt in or out of them, and the effect of opting out of these on your use of HotSpotMe's apps.

HotSpotMe may also collect personal information about you through voluntary surveys. Your responses to such surveys are collected on the basis of consent, and will be deleted once no longer necessary for the purposes collected.