

## **PROTO Privacy**

Privacy is one of PROTO's core values. Your device is important to many aspects of your business. Our aim is to keep your business your business.

### **Collection and Use of Data**

Data referred to under this policy can be used to identify or contact a user of a PROTO Device. You may be asked to provide information anytime you are in contact with PROTO or a PROTO affiliated company. PROTO and its affiliates may share this information with each other and use it consistent with this Privacy Policy. They may also combine it with other information to provide and improve our products, services, and content. You are not required to provide the information that we have requested, but, if you chose not to do so, in many cases we will not be able to provide you with our products or services or respond to any queries you may have. Here are some examples of the types of information PROTO may collect and how we may use it:

### **What information we collect**

- When you download a software update, connect to our services, contact us or participate in an online survey, we may collect a variety of information, including your organization's name, mailing address, phone number, email address, contact preferences, device identifiers, IP address, location information, and credit card information, if applicable.

### **How we use your information**

We may process your information: for the purposes described in this Privacy Policy, with your consent, for compliance with a legal obligation to which PROTO is subject, for the performance of a contract to which you are party, in order to protect your vital interests, or when we have assessed it is necessary for the purposes of the legitimate interests pursued by PROTO or a third party to whom it may be necessary to disclose information. If you have questions about this legal basis you can contact the Data Protection Officer.

- The data information we collect allows us to keep you posted on PROTO's latest product announcements, software updates, and upcoming events. If you don't want to be on our mailing list, you can opt-out anytime by updating your preferences.
- We also use data information to help us create, develop, operate, deliver, and improve our products, services, content and advertising. We may also use your information for account and network security purposes, including in order to protect our services for the benefit of all our users, and pre-screening or scanning uploaded content for potentially illegal content.
- From time to time, we may use your data information to send important notices, such as communications about changes to our terms, conditions, and policies. Because this information is important to your interaction with PROTO, you may not opt out of receiving these communications.
- We may also use data information for internal purposes such as auditing, data analysis, and research to improve PROTO's products, services, and customer communications.

### **Source of your information where they are not collected from you**

We may validate the information provided by you when creating a PROTO ID when applicable with a third party for security and fraud prevention purposes.

### **Collection and Use of Information**

We also collect data in a form that does not, on its own, permit direct association with any specific organization. We may collect, use, transfer, and disclose information for any purpose. The following are some examples of information that we collect and how we may use it:

- We may collect information such as industry, zip code, area code, unique device identifier, referrer URL, location, and the time zone where a PROTO product is used so that we can better understand customer behavior and improve our products, services, and advertising.
- We may collect information regarding customer activities on our website, cloud services, and from our other products and services. This information is aggregated and used to help us provide more useful information to our customers and to understand which parts of our website, products, and services are of most interest.
- We may collect and store details of how you use our services, including search queries. This information may be used to improve the relevancy of results provided by our services. Except in limited instances to ensure quality of our services over the Internet, such information will not be associated with your IP address.
- With your explicit consent, we may collect data about how you use your device and applications in order to help app developers improve their apps.

### **Cookies and Other Technologies**

PROTO's websites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-specific identifier information.

As is true of most internet services, we gather some information automatically and store it in log files. This information includes Internet Protocol (IP) addresses, browser type and language, Internet service provider (ISP), referring and exit websites and applications, operating system, date/time stamp, and clickstream data. We use this information to understand and analyze trends, to administer the site, to learn about user behavior on the site, to improve our product and services. PROTO may use this information in our marketing and advertising services.

### **Transfer of Personal Data Between Countries**

PROTO products and offerings connect you to the world. To make that possible, your personal data may be transferred to or accessed by entities around the world. PROTO complies with laws on the transfer of personal data between countries to help ensure your data is protected, wherever it may be.

If you do not reside in the U.S., your personal data may be processed by PROTO. For example, imagery and associated data may be collected by PROTO around the world to improve video latency and to support PROTO's video capture features.

PROTO's international transfer of personal data collected in the European Area, the United Kingdom, and Switzerland is governed by Standard Contractual Clauses found at [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en). PROTO's international transfer of personal data collected in participating Asia-Pacific Economic Cooperation (APEC) countries abides by the APEC Cross-Border Privacy Rules (CBPR) System and Privacy Recognition for Processors (PRP) System for the transfer of personal data. If you have questions or unresolved concerns, contact our Chief Technology Officer at [support@protohologram.com](mailto:support@protohologram.com).

### **Others**

It may be necessary – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – for PROTO to disclose your information. We may also disclose information about you if we determine that for purposes of national security, law enforcement, or other issues of public importance,

disclosure is necessary or appropriate. We may also disclose information about you, but only where there is a lawful basis for doing so, if we determine that disclosure is reasonably necessary to enforce our terms and conditions or protect our operations or users. This could include providing information to public or governmental authorities. Additionally, in the event of a reorganization, merger, or sale we may transfer any and all information we collect to the relevant third party.

### **Protection of Information**

PROTO takes the security of your information very seriously. PROTO online services protect your information during transit using encryption. When your data is stored by PROTO, we use computer systems with limited access housed in facilities using security measures. Cloud data is stored in encrypted form including when we utilize third-party storage.

### **Retention of Information**

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy and our service specific privacy summaries. Data is retained indefinitely unless deletion is requested by the customer, in which case, data is deleted within thirty (30) days of request.

### **Location-Based Services**

To provide location-based services on PROTO products, PROTO and our partners and licensees, such as maps data providers, may collect, use, and share precise location data, including the real-time geographic location of your PROTO device. Where available, location-based services may use GPS, Bluetooth, and your IP Address, along with crowd-sourced Wi-Fi hotspot and cell tower locations, and other technologies to determine your devices' approximate location. Unless you provide consent, this location data is collected anonymously in a form that does not uniquely identify you and is used by PROTO and our partners and licensees to provide and improve location-based products and services. For example, your device may share its geographic location with application providers when you opt in to their location services.

### **Third-Party Sites and Services**

PROTO websites, products, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties – for example, a third-party app.

Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties. If you purchase a subscription in a third party app, we may offer the ability to create a Subscriber ID that is unique to you and the developer or publisher which we use to provide reports to the developer or publisher that include information about the subscription you purchased, and your country of domicile.

### **California Privacy Disclosures**

Although the California Consumer Privacy Act ("CCPA") does not currently apply to PROTO, the CCPA provides California consumer residents with specific rights regarding their personal information. This section describes a California resident's CCPA rights.

The following is not applicable to de-identified or aggregated personal information or data publicly available.

### **Information we collect**

In the execution of our services and when visiting our website we collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device. In particular, we may collect and disclose for a business purpose the following categories of data from our users:

Category	Examples	
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address	COLLECT: YES  DISCLOSE: YES, to affiliates, service providers, and other vendors, if any, mentioned in our Privacy Policy.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information  Some personal information included in this category may overlap with other categories.	COLLECT: NO  DISCLOSE: NO
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	COLLECT: NO  DISCLOSE: NO
D. Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	COLLECT: YES  DISCLOSE: YES, to affiliates, service providers, and other vendors mentioned in this Privacy Policy.
E. Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	COLLECT: NO  DISCLOSE: NO
F. Internet or other similar network activity	Browsing history, search history, information on a user's interaction with a website, application, advertisements or other content.	COLLECT: YES  DISCLOSE: YES, to affiliates, service providers, and other vendors mentioned in this Privacy Policy.
G. Geolocation data	Physical location or movements, or the location of your device.	COLLECT: YES

		DISCLOSE: YES, to affiliates, service providers, and other vendors mentioned in this Privacy Policy.
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information	COLLECT: NO  DISCLOSE: NO
I. Professional or employment-related information	Current or past job history or performance evaluations	COLLECT: NO  DISCLOSE: NO
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. § 1232g, 34 C.F.R. Part 99))	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	COLLECT: NO  DISCLOSE: NO

We disclose your data for a business purpose to the following categories of third parties:

- Service providers
- Third parties to whom we disclose your personal information in connection with products or services we provide to you, and to accomplish our business purposes and objectives as set forth in the Privacy Policy.

**Data from children?**

We do not intentionally collect information from children under the age of eighteen (18) years as we do not offer services to them. Parents who set up a profile holding information about children under the age of eighteen (18) years can only do so by granting parental consent which consent choices can be changed by the adults in the family. We do not direct services to children under the age of sixteen (16) years old. As a result, we do not knowingly process data or information from children under sixteen (16) years old.

**Do not sell?**

We do not respond to “Do Not Sell” requests as we do not track your data across third party websites, nor do we sell your data to third parties to provide targeted advertising. Nonetheless, we aim to make your online experience and interaction with our websites as informative, relevant and supportive as possible. One way of achieving this is to use cookies or similar techniques, which store information about your visit to our site on your computer. For more information on how we use cookies and other tracking technologies, read our Cookie Policy.

**Our Companywide Commitment to Your Privacy**

To make sure your information is secure, we communicate our privacy and security guidelines to PROTO employees and strictly enforce privacy safeguards within the company. PROTO is committed to the protection, security, availability, and confidentiality of customer data within the PROTO Cloud application.

**Privacy Questions**

If you have any questions or concerns about PROTO's Privacy Policy or data processing, you would like to contact our Data Protection Officer, or if you would like to make a complaint about a possible breach of local privacy laws, please contact us. You can always contact us by phone at the relevant PROTO support number for your country or region.

When a privacy question or question about information received in response to an access/download request is received we have a dedicated team which triages your contact to address your issue. Where your issue may be more substantive in nature, we may request more information from you. All such substantive contacts receive a response within seven (7), days wherever possible - providing a response on the issue raised, requesting additional information where necessary or indicating that a response will require additional time.

Where your complaint indicates an improvement could be made in our handling of privacy issues we will take steps to make such an update at the next reasonable opportunity. In the event that a privacy issue has resulted in a negative impact on your organization then we will take steps to address that with you.

PROTO may update its Privacy Policy from time to time. When we change the policy in a material way, a notice will be posted on our website along with the updated Privacy Policy. We will also contact you via your contact information on file, for example by email, notification or some other equivalent method.

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