

Reach Privacy Policy

Welcome to the Reach Systems, Inc. (“Reach,” “we,” “us,” or “our”) ReachNet platform (“ReachNet”). Reach values the privacy of all users of ReachNet, and has created this Privacy Policy to explain how Reach collects, stores, uses, and discloses your information. By using ReachNet, you expressly consent to the information handling practices described in this notice.

This Privacy Policy is incorporated into and is subject to the ReachNet Terms of Use (“Terms”). Your use of ReachNet and any information you provide through ReachNet are subject at all time to this Privacy Policy and the Terms. Any capitalized terms not defined herein shall have the meanings ascribed to them in the Term.

1. Information Reach Collects:

- **Personally Identifiable Information:** You will enter what is generally called “personally identifiable” information (such as name, email address, postal mailing address, home/mobile telephone number, fingerprint) into ReachNet (“Personal Information”). Administrators may enter the Personal Information of other individuals in connection with configuring and managing the interaction of such individuals (“Enrolled Individuals”) with the Reach ACS.
- **Configuration Information:** You will enter certain information other than Personal Information into ReachNet related to configuration and management of the Reach ACS; by way of example, such information would include the time periods during which a given door may be opened (“Configuration Information”).
- **ACS Information:** As part of the core functionality of the Reach ACS, ReachNet will collect certain information from Reach ACS hardware components, such as door access controllers, as well as from custom add-ons that may be installed by you or your Dealer, such as analog sensors (“ACS Information”).
- **Cookies Information:** When you access ReachNet, we may send one or more cookies – small text files containing a string of alphanumeric characters – to your computer that will store certain information you enter into ReachNet (“Cookies Information”). Reach may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to ReachNet. Persistent cookies can be removed. Please review your web browser “Help” file to learn the proper way to modify your cookie settings.
- **Logged Information:** When you access ReachNet, we may automatically record certain information from your system by using different types of tracking technology (“Logged Information”). Logged Information may include Internet Protocol address (“IP Address”), a unique device or user ID, version of software installed, system type, the content and pages that you access on ReachNet, and the dates and times that you visit ReachNet.

2. How Reach Uses Information:

- Reach uses the information that you provide or that we collect to operate and provide all of the features and services of ReachNet and the Reach ACS.
- Except as otherwise provided for in the Terms and this Privacy Policy, Reach shall only access your Personally Identifiable Information, Configuration Information, and Sensor Information

when directed to do so by you in connection with configuring ReachNet and supporting your use of the Reach ACS.

- We will use your email address, without further consent, for administrative communications such as notifying you of major ReachNet updates or for customer service purposes.
- Reach may use Configuration Information, ACS Information, Cookies Information, and Automatically Collected Information, in aggregate form such that you or your Subscribing Organization cannot be identified, to understand the usage trends and preferences of ReachNet and Reach ACS users, to improve the ReachNet interface, and to create new features and functionality.
- Reach may use “Automatically Collected” information and “Cookies” information to: (a) remember your information so that you will not have to re-enter it during your visit or the next time you access ReachNet; (b) monitor aggregate ReachNet usage metrics such as total number of visitors and pages accessed; and (c) track your entries, submissions, and status in any promotions or other activities.

3. When Your Information Is Disclosed:

- Except as otherwise provided herein or in the Terms, Reach does not share your information with other organizations without your express consent.
- We may disclose your information to affiliated companies, Dealers, or other businesses or persons to: provide ReachNet hosting, maintenance, and security services; conduct data analysis and create reports; and assist Reach in improving ReachNet and creating new services features. We require that these parties process such information in compliance with this Privacy Policy, we authorize only a limited use of such information, and we require these parties to use reasonable confidentiality measures.
- Reach may disclose User information if required to do so by law or in the good-faith belief that such action is necessary to comply with state and federal laws or respond to a court order, judicial or other government subpoena, or warrant. In some cases, we may be required to make such disclosures without providing notice to Users.
- Reach also reserves the right to disclose your information that we believe, in good faith, is appropriate or necessary to take precautions against liability; protect Reach from fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of ReachNet; or to protect the rights, property, or personal safety of Reach, Dealers, users of ReachNet, or others.

4. Data Security:

Reach uses commercially reasonable physical, managerial, and technical safeguards to preserve the integrity and security of our systems and your personal information during transmission and storage. We cannot, however, ensure or warrant the security of any information you transmit to Reach, and you do so at your own risk. We make no guarantee that your information may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, technical, or managerial safeguards.

If Reach learns of a security systems breach, then we may attempt to notify you electronically so that you can take appropriate protective steps. Reach may post a notice on ReachNet if a security breach occurs. Depending on where you live, you may have a legal right to receive notice of a security

breach in writing. To receive a free written notice of a security breach you should notify us at support@reachsystems.com.

5. Children's Privacy:

IF YOU ARE UNDER 13 YEARS OF AGE, THEN PLEASE DO NOT USE OR ACCESS REACHNET AT ANY TIME OR IN ANY MANNER. Reach does not knowingly collect or maintain personally identifiable information from persons under 13 years-of-age. If Reach learns that personally-identifiable information of persons less than 13 years-of-age has been collected on or through ReachNet, then Reach will take the appropriate steps to delete this information.

6. Europe:

If you are subject to the European Union Data Protection Directive, laws implementing the Directive, or similar laws, you hereby freely consent to the transfer of your personally identifiable information outside of the European Union to the United States and other countries and to the use of your personally identifiable information by Reach as described in this Privacy Policy

7. Change of Control:

In the event that Reach is acquired by or merged with a third-party entity, we reserve the right, in any of these circumstances, to transfer or assign the information that we have collected from you as part of that merger, acquisition, sale, or other change of control.

8. Changes and Updates:

This Privacy Policy may be revised periodically without further notice to you and this will be reflected by a "last modified" date below. Please revisit this page to stay aware of any changes. In general, we only use your personal information in the manner described in the Privacy Policy in effect when we received that personal information. Your continued use of ReachNet constitutes your agreement to this Privacy Policy and any future revisions.

For revisions to this Privacy Policy that may be materially less restrictive on our use or disclosure of personal information you have provided to us, we will make reasonable efforts to notify you and obtain your consent before implementing revisions with respect to such information.

9. Effective Date, Date Last Modified:

Privacy Policy effective as of July 15, 2007.

Privacy Policy last modified on February 25, 2008.

10. Reach Contact Information:

Please contact Reach with any questions or comments about this Privacy Policy and our third-party disclosure practices: 1330 Broadway, Suite 1201, Oakland, CA 94612 or by email: support@reachsystems.com.