# PRIVACY POLICY

# LGC SAFETALK TECHNOLOGIES LLC

Last modified: 3/20/2024

#### 1. Introduction

LGC Safetalk, LLC ("LGC Safetalk", "we", "our" or "us") respects your privacy and is committed to protecting it by complying with this Privacy Policy (the "Policy"). As used in this Policy and unless separately identified as applicable to either an individual or entity, "you" and "your" refer to both you individually and the entity on behalf of which you are entering into these Terms.

This Policy describes the types of information LGC Safetalk may collect from you or that you may provide when you visit the website https://lgcsafetalkconnect.com and includes any content or information provided as part of the Site or such related products, services or websites (each website a "Site" and collectively, the "Sites") or online or mobile applications (each application an "App," collectively, the "Apps"; collectively with the Sites, the "Platform") and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to the information LGC Safetalk collects:

- On the Platform.
- In email, text, and other electronic messages between you and the Platform.
- Through mobile and desktop applications you download from the Platform, which provides dedicated non-browser-based interaction between you and the Platform.
- When you interact with our advertising and applications on third-party Sites and services, if those applications or advertising include links to this Policy.

It does not apply to information collected by:

- LGC Safetalk offline or through any other means, including on any other Site operated by LGC Safetalk or any third party; or
- Any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Site.

Please read this Policy carefully to understand our policies and practices regarding your information and how LGC Safetalk will treat it. If you do not agree with our policies and practices, your choice is not to use our Platform. By accessing or using the Platform, you agree to this privacy Policy. This Policy may change from time to time (*see* Changes to Our Privacy Policy). Your continued use of the Platform after LGC Safetalk makes changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

#### 2. Children Under the Age of 16

Our Platform is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Site. LGC Safetalk does not knowingly collect Personal Information from children under 16. If you are under 16, do not use or provide any information on the Platform or through any of its features, register on the Site, make any purchases through the Site, use any of the interactive or public comment features of the Platform, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use. If LGC Safetalk learns that LGC Safetalk has collected or received Personal Information from a child under 16 without verification of parental consent, LGC Safetalk will delete that information. If you believe LGC Safetalk might have any information from or about a child under 16, please contact us at privacy@safetalktech.com.

California residents under 16 years of age may have additional rights regarding the collection and sale of their Personal Information. Please see Your California Privacy Rights for more information.

# 3. Information LGC Safetalk Collects About You and How LGC Safetalk Collects It

LGC Safetalk collects several types of information from and about users of our Platform, including information:

- By which you may be personally identified, such as your name, postal address, e-mail address, telephone number or social media usernames and any other identifier by which you may be contacted online or offline ("**Personal Information**");
- That is about you but individually does not identify you, such as [race, creed, gender, or religious affiliation.
- About your internet connection, the equipment you use to access our Platform, and usage details.

LGC Safetalk collects this information:

Directly from you when you provide it to us.

Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies[, web beacons,] [and other tracking technologies].

[From third parties, for example, our business partners.]

Information You Provide to LGC Safetalk

The information LGC Safetalk collects on or through our Platform may include:

Information that you provide by filling in forms on our Platform. This includes information provided at the time of registering to use our Platform, and subscribing to our service, when you report a problem with our Platform.

Records and copies of your correspondence (including email addresses), if you contact us.

{KH777086.DOCX} 2

You also may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Site, or transmitted to other users of the Site or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Although LGC Safetalk limits access to certain pages/you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, LGC Safetalk cannot control the actions of other users of the Site with whom you may choose to share your User Contributions. Therefore, LGC Safetalk cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

#### Information LGC Safetalk Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Platform, LGC Safetalk may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

Details of your visits to our Platform, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Site.

Information about your computer and internet connection, including your IP address, operating system, and browser type.

We may track your browsing activity for website improvement and analytics. We do not respond to Do Not Track (DNT) signals. To learn how to opt out of tracking, please see our section on cookie policy. Additionally, you may adjust your browser settings for my privacy controls as you desire.

The information LGC Safetalk collects automatically may include Personal Information, or LGC Safetalk may maintain it or associate it with Personal Information LGC Safetalk collects in other ways or receives from third parties. It helps us to improve our Platform and to deliver a better and more personalized service, including by enabling us to:

Estimate our audience size and usage patterns.

Store information about your preferences, allowing us to customize our Platform according to your individual interests.

Speed up your searches.

Recognize you when you return to our Platform.

The technologies LGC Safetalk uses for this automatic data collection may include:

**Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate settings on your browser. However, if you select this setting you may be unable to access certain parts of our Platform. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Platform.

**Flash Cookies.** Certain features of our Platform may use locally stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Platform. Flash cookies are not managed by the same browser settings as are used for browser cookies. For

{KH777086.DOCX} 3

information about managing your privacy and security settings for Flash cookies, see Choices About How LGC Safetalk Uses and Discloses Your Information.

Web Beacons. Pages of our Site and our e-mails may contain small electronic files known as Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the LGC Safetalk, for example, to count users who have visited those pages or opened an email and for other related Site statistics (for example, recording the popularity of certain Site content and verifying system and server integrity).

# [Third-Party Use of Cookies [and Other Tracking Technologies]]

[Some content or applications, including advertisements, on the Site are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies [alone or in conjunction with Web beacons or other tracking technologies] to collect information about you when you use our Platform. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different Sites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

LGC Safetalk does not control these third parties tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see Choices About How LGC Safetalk Uses and Discloses Your Information.]

# How LGC Safetalk Uses Your Information

LGC Safetalk use information that LGC Safetalk collects about you or that you provide to us, including any Personal Information:

To present our Platform and its contents to you.

To provide you with information, products, or services that you request from us.

To fulfill any other purpose for which you provide it.

To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.

To notify you about changes to our Platform or any products or services LGC Safetalk offers or provides through it.

In any other way, LGC Safetalk may describe when you provide the information.

For any other purpose with your consent.

LGC Safetalk may use the information LGC Safetalk has collected from you to enable us to display advertisements to our advertisers' target audiences. Even though LGC Safetalk does not disclose your Personal Information for these purposes without your consent if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.]

#### **Disclosure of Your Information**

LGC Safetalk may disclose aggregated information about our users[, and information that does not identify any individual,] without restriction. This is statistically aggregated data that all websites collect but with no attribution to you as a user individually.

LGC Safetalk may disclose Personal Information that LGC Safetalk collects or you provide as described in this Privacy Policy:

To our subsidiaries and affiliates.

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of LGC Safetalk's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by LGC Safetalk about our Platform users is among the assets transferred.

To fulfill the purpose for which you provide it. [For example, if you give us an email address to use the "refer a friend" feature of our Platform, LGC Safetalk will transmit the contents of that email and your email address to the recipients.]

For any other purpose disclosed by us when you provide the information.

With your consent.

LGC Safetalk may also disclose your Personal Information:

To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

If LGC Safetalk believes disclosure is necessary or appropriate to protect the rights, property, or safety of LGC Safetalk, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

#### Choices About How LGC Safetalk Uses and Disclose Your Information

LGC Safetalk strives to provide you with choices regarding the Personal Information you provide to us. LGC Safetalk has created mechanisms to provide you with the following control over your information:

**Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's Site. If you disable or refuse cookies, please note that some parts of the Platform may then be inaccessible or not function properly.

[Disclosure of Your Information for Third-Party Advertising.] If you do not want us to share your Personal Information with unaffiliated or non-agent third parties for promotional purposes, you can opt-out by [checking the relevant box located on the form on which LGC Safetalk collects your data (the [order form/registration form. You can also always opt out by [logging into the Site and adjusting your user preferences in your account profile][,][ checking or unchecking the relevant boxes] [or by] sending us an email with your request to unsubscribe@safetalktech.com.

{KH777086.DOCX} 5

[Promotional Offers from the LGC Safetalk. If you do not wish to have your [email address/contact information] used by LGC Safetalk to promote our own or third-party products or services, you can opt-out by [[checking the relevant box located on the form on which LGC Safetalk collects your data (the order form/registration form])/OTHER OPT-OUT METHOD or at any other time by [logging into the Site and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by sending us an email stating your request to unsubscribe@safetalktech.com. If LGC Safetalk has sent you a promotional email, you may send us a return email asking to be omitted from future email distributions. This opt-out does not apply to information provided to the LGC Safetalk as a result of a product purchase, warranty registration, product service experience, or other transactions.

LGC Safetalk does not control third-party collection or use of your information to serve interestbased advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("**NAI**") on the NAI's Site.

California residents may have additional Personal Information rights and choices. Please see Visit this link for your California privacy rights. Visit: https://oag.ca.gov/privacy/ccpa

Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit a request to this designated address: <u>https://www.leg.state.nv.us/nrs/nrs-603a.html</u>. However, please know that LGC Safetalk does not currently sell data triggering that statute's opt-out requirements.

# [Accessing and Correcting Your Information]

You can review and change your Personal Information by logging into the Site and visiting your account profile page.

You may also send us an email at support@safetalktech.com to request access to, correct, or delete any Personal Information that you have provided to us. LGC Safetalk cannot delete your Personal Information except by also deleting your user account. LGC Safetalk may not accommodate a request to change information if LGC Safetalk believes the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Site, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Site users. [Proper access and use of information provided on the Site, including User Contributions, is governed by our terms of use as stated in this document.

California residents may have additional Personal Information rights and choices. Please see <u>https://oag.ca.gov/privacy/ccpa</u> for more information.

## [Your California Privacy Rights]

If you are a California resident, California law may provide you with additional rights regarding our use of your Personal Information. To learn more about your California privacy rights, visit https://oag.ca.gov/privacy/ccpa.

[California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an email to info@safetalktech.com.

# [Data Security]

LGC Safetalk has implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls and additional layers of security that won't be disclosed. Any payment transactions and OTHER INFORMATION will be encrypted using SSL technology

The safety and security of your information also depend on you. Where LGC Safetalk has given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. LGC Safetalk asks you not to share your password with anyone. LGC Safetalk recommends where possible implementing the use of multi-factor authentication or preferably the use of passcodes that replace passwords for access.

Unfortunately, the transmission of information via the Internet is not completely secure. Although LGC Safetalk does our best to protect your Personal Information, LGC Safetalk cannot guarantee the security of your Personal Information transmitted to our Platform. Any transmission of Personal Information is at your own risk. LGC Safetalk is not responsible for circumvention of any privacy settings or security measures contained on the Site.]

# Changes to Our Privacy Policy

It is our policy to post any changes LGC Safetalk makes to our Privacy Policy on this page with a notice that the Privacy Policy has been updated on the homepage, https://lgcsafetalkconnect.com. If LGC Safetalk makes material changes to how LGC Safetalk treats our users' Personal Information, LGC Safetalk will notify you [by email to the primary email address specified in your account. The date the privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring LGC Safetalk has an up-to-date active and deliverable email address for you, and for periodically visiting our Platform and this Privacy Policy to check for any changes.

## Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

## privacy@safetalktech.com