

PARKIFI PRIVACY POLICY

Parkifi, Inc. (“**Parkifi**”) is committed to protecting your privacy. We have prepared this Privacy Policy to describe to you our practices regarding the Personal Data we collect from users of our website, located at *www.Parkifi.com*, and our mobile Application(s) (“**Mobile Apps(s)**”) (collectively, the “**Apps**”) and online services (“**Services**”). The term “Mobile Apps” includes, and this Privacy Policy applies to, third-party branded mobile applications that are powered by Parkifi and that link to this Privacy Policy.

1. User Consent. By registering with Parkifi or submitting Personal Data through our Apps or Services, you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

2. Types of Data We Collect. “**Personal Data**” means data that allows someone to identify or contact you, including, for example, your name, address, telephone number, e-mail address, as well as any other non-public information about you that is associated with or linked to any of the foregoing data. “**Anonymous Data**” means data that is not associated with or linked to your Personal Data; Anonymous Data does not, by itself, permit the identification of individual persons. We collect Personal Data and Anonymous Data, as described below. We collect information from you in a variety of ways: when you browse or interact with our website, when you register to use the Services, and when you use the Services. **We collect precise location information, as described below.**

(a) Services Registration.

- **Account.** We may collect Personal Data from you, such as your first and last name, e-mail address, phone number, car license plate number(s), and password when you create an account to log in to the Services (“**Account**”). We will collect your precise location and your Bluetooth media access control address (“**BT ID**”) when you register for an Account and we will associate your BT ID with your Personal Data. We may also collect your device advertising identifier.
- **Payment.** If you choose to use the Apps to pay for parking (where that functionality is available), we will also collect your credit card information.
- **Preferences.** We may enable you to store certain preferences in the Mobile App or your Account, such as, your preferred parking areas, types of parking, starting points, and destinations.

(b) Route and Parking Services.

- **Routing.** We collect information when you use the Mobile App to obtain recommended routes to destinations, including your precise starting and ending locations, route options, parking suggestions near your destination, and chosen routes.
- **Precise Location.** When the Mobile App is in use, it will collect your precise location, through use of GPS on your mobile device and possible other signals such as nearby wi-fi access points or Bluetooth-enabled devices. We may use this information to, for example, determine whether you have entered or exited a parking facility.

- Bluetooth Addresses. When the Mobile App is in use, it will collect BT IDs of other devices in its area, including, for example, ParkiFi parking sensors (which are installed in ParkiFi-enabled parking facilities and parking spaces) and your car (if your car has Bluetooth enabled), and we will associate those BT IDs with your Personal Data.
- ParkiFi Sensors. ParkiFi parking sensors will collect BT IDs of the Bluetooth-enabled devices near them, including, for example, your mobile device(s) (regardless of whether the Mobile App is installed on it) and your car. When ParkiFi parking sensors identify devices nearby via their Bluetooth signals and we have associated the BT IDs of those devices with your Personal Data, we may log the fact that you parked at a parking spot near that sensor. In other words, we may keep track of the fact that one of the sensors “saw” you based on identifying the BT ID of what we think is one of your devices.
- Unique Identifiers. We may create separate unique identifiers to retain instead of the BT IDs we have associated with your Personal Data.
- Payment. When you choose to pay for parking via our Mobile App, we will collect all information necessary to complete the transaction, including your name, credit card information, billing information (if we did not collect such information when you initially registered for an Account).

(c) General – Voluntary Disclosures by You.

- Contact Us. If you provide us feedback or contact us via e-mail, we will collect your name and e-mail address, as well as any other content included in the e-mail, in order to send you a reply.
- Surveys. When you participate in one of our surveys, we may collect additional profile information.
- Promotions. If you participate in a sweepstakes, contest or giveaway on our Apps, we may ask you for your e-mail address and/or home number (to notify you if you win or not). We may also ask for first and last names, and sometimes post office addresses to verify your identity. In some situations, we may need additional information as a part of the entry process, such as a prize selection choice. These sweepstakes and contests are voluntary. We recommend that you read the rules for each sweepstakes and contest that you enter.
- Other Collections. We may also collect Personal Data at other points in our Apps that state that Personal Data is being collected.

(d) General – Automatic Data Collection.

- IP Address. To make our Apps and Services more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (“IP”) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit. We may associate your IP address with the BT IDs identified to you and your other Personal Data.

- Log Files. As is true of most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, Internet service provider (“**ISP**”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Apps, track users’ movements around the Apps, gather demographic information about our user base as a whole, and better tailor our Services to our users’ needs. For example, some of the information may be collected so that when you visit the Apps or the Services again, it will recognize you and the information could then be used to serve advertisements and other information Appropriate to your interests. Except as noted in this Privacy Policy, we do not link this automatically-collected data to Personal Data.
- Cookies. Like many online services, we use cookies to collect information. “**Cookies**” are small pieces of information that a website sends to your computer’s hard drive while you are viewing the website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Apps. This type of information is collected to make the Apps more useful to you and to tailor the experience with us to meet your special interests and needs.
- Pixel Tags. In addition, we use “**Pixel Tags**” (also referred to as clear Gifs, Web beacons, or Web bugs). Pixel Tags are tiny graphic images with a unique identifier, similar in function to Cookies, that are used to track online movements of Web users. In contrast to Cookies, which are stored on a user’s device, Pixel Tags are embedded invisibly in Web pages. Pixel Tags also allow us to send e-mail messages in a format users can read, and they tell us whether e-mails have been opened to ensure that we are sending only messages that are of interest to our users. We may use this information to reduce or eliminate messages sent to a user. We do not tie the information gathered by Pixel Tags to our users’ Personal Data.
- Google Analytics. We use Google Analytics to help analyze how users use the Apps. Google Analytics uses Cookies and other technologies to collect information such as how often users visit the Apps, what pages they visit, and what other Apps they used prior to coming to the Apps. We use the information we get from Google Analytics only to improve our Apps and Services. Google Analytics collects only the IP address assigned to you on the date you visit the Apps, rather than your name or other personally identifying information. We do not combine the information generated through the use of Google Analytics with your Personal Data. Although Google Analytics plants a persistent Cookie on your web browser to identify you as a unique user the next time you visit the Apps, the Cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to the Apps is restricted by the Google Analytics Terms of Use and the Google Privacy Policy.

(e) **Collection of Data by Advertisers**. We may also use third parties to serve ads on the Apps. Certain third parties may automatically collect information about your visits to this and other websites, your IP address, your ISP, the browser you use to visit our Apps (but not your name, address, e-mail address or telephone number). They do this by using Cookies, Pixel Tags,

or other technologies. Information collected may be used, among other things, to deliver advertising targeted to your interests and to better understand the usage and visitation of our Apps and the other Apps tracked by these third parties. This policy does not apply to, and we are not responsible for, Cookies or Pixel Tags in third party ads, and we encourage you to check the privacy policies of advertisers and/or ad services to learn about their use of Cookies and other technologies. You may opt out of receiving interest-based advertising from some of our partners by emailing info@parkifi.com. If you would like more information about this practice and to know your choices about not having this information used by these companies, click here: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org>. We do not currently respond to “do not track” signals from web browsers.

3. Use of Your Personal Data.

(a) General Use. In general, Personal Data we collect is used either to respond to requests that you make, or to aid us in serving you better. We use your Personal Data in the following ways:

- facilitate the creation of and secure your Account;
- identify you as a user in our system;
- provide improved administration of our Apps and Services;
- provide the Services you request;
- improve the quality of experience when you interact with our Apps and Services;
- send you a welcome e-mail to verify ownership of the e-mail address provided when your Account was created;
- send you administrative e-mail notifications, such as security or support and maintenance advisories;
- respond to your inquiries related to employment opportunities or other requests;
- make telephone calls to you, from time to time, as a part of secondary fraud protection or to solicit your feedback;
- send newsletters, surveys, offers, and other promotional materials related to our Services and for other marketing purposes of ParkiFi;
- send mobile application notifications to you; and
- display promotions to you, including promotions relevant to your location.

(b) User Testimonials. If you send us a testimonial about our Services, we may use and disclose it (including your first name) in our discretion. However, we will obtain your consent prior to posting your full name along with the testimonial.

(c) Creation of Anonymous Data. We may create Anonymous Data records from Personal Data by excluding information (such as your name) that makes the data personally identifiable to you. We use this Anonymous Data to analyze usage patterns so that we may enhance our Services and improve Apps navigation. We reserve the right to use Anonymous Data for any purpose and disclose Anonymous Data to third parties in our sole discretion.

4. Disclosure of Your Personal Data. We disclose your Personal Data as described below and as described elsewhere in this Privacy Policy.

(a) **Parking Partners.** We may disclose certain Personal Data to the parking facilities and other partners we work with. These partners may use your Personal Data for confirming your parking at their facilities.

(b) **Third Party Service Providers.** We may share your Personal Data with third party service providers to: provide you with the Services that we offer you through our Apps; to conduct quality assurance testing; to facilitate creation of accounts; to provide technical support; and/or to provide other services to the ParkiFi. These third party service providers are required not to use your Personal Data other than to provide the services requested by ParkiFi.

(c) **Affiliates.** We may share some or all of your Personal Data with our parent ParkiFi, subsidiaries, joint ventures, or other companies under a common control (“**Affiliates**”), in which case we will require our Affiliates to honor this Privacy Policy.

(d) **Corporate Restructuring.** We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our shares, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

(e) **Third Parties for Marketing.** We may enter into agreements with companies to disclose Personal Data to them for their marketing purposes.

BECAUSE WE DO NOT CONTROL THE PRIVACY PRACTICES OF THESE THIRD PARTY COMPANIES, YOU SHOULD READ AND UNDERSTAND THEIR PRIVACY POLICIES.

(f) NOTICE TO CALIFORNIA RESIDENTS – YOUR CALIFORNIA PRIVACY RIGHTS.

(AS PROVIDED BY CALIFORNIA CIVIL CODE SECTION 1798.83)

A CALIFORNIA RESIDENT WHO HAS PROVIDED PERSONAL DATA TO A BUSINESS WITH WHOM HE/SHE HAS ESTABLISHED A BUSINESS RELATIONSHIP FOR PERSONAL, FAMILY, OR HOUSEHOLD PURPOSES (A “CALIFORNIA CUSTOMER”) MAY REQUEST INFORMATION ABOUT WHETHER THE BUSINESS HAS DISCLOSED PERSONAL INFORMATION TO ANY THIRD PARTIES FOR THE THIRD PARTIES’ DIRECT MARKETING PURPOSES. IN GENERAL, IF THE BUSINESS HAS MADE SUCH A DISCLOSURE OF PERSONAL DATA, UPON RECEIPT OF A REQUEST BY A CALIFORNIA CUSTOMER, THE BUSINESS IS REQUIRED TO PROVIDE A LIST OF ALL THIRD PARTIES TO WHOM PERSONAL DATA WAS DISCLOSED IN THE PRECEDING CALENDAR YEAR, AS WELL AS A LIST OF THE CATEGORIES OF PERSONAL DATA THAT WERE DISCLOSED. CALIFORNIA CUSTOMERS MAY REQUEST FURTHER INFORMATION ABOUT OUR COMPLIANCE WITH THIS LAW BY E-MAILING INFO@PARKIFI.COM. PLEASE NOTE THAT WE ARE REQUIRED TO RESPOND TO ONE REQUEST PER

CALIFORNIA CUSTOMER EACH YEAR AND WE ARE NOT REQUIRED TO RESPOND TO REQUESTS MADE BY MEANS OTHER THAN THROUGH THIS E-MAIL ADDRESS.

(g) **Other Disclosures.** Regardless of any choices you make regarding your Personal Data (as described below), ParkiFi may disclose Personal Data if it believes in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on ParkiFi; (c) to protect or defend the rights or property of ParkiFi or users of the Apps or Services; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

5. Your Choices Regarding Information. You have several choices regarding the use of information on our Service:

(a) **Email Communications.** We may periodically send you free newsletters and e-mails that directly promote the use of our Apps or Services. When you receive newsletters or promotional communications from us, you may indicate a preference to stop receiving further communications from us and you will have the opportunity to “opt-out” by following the unsubscribe instructions provided in the e-mail you receive or by contacting us directly (please see contact information below). Despite your indicated e-mail preferences, we may send you service related communications, including notices of any updates to our Terms of Use or Privacy Policy.

(b) **App Notifications.** We may send you notifications on your mobile device. You may disable these notifications in the settings of your device.

(c) **Cookies.** If you decide at any time that you no longer wish to accept Cookies from our Service for any of the purposes described above, then you can instruct your browser, by changing its settings, to stop accepting Cookies or to prompt you before accepting a Cookie from the websites you visit. Consult your browser’s technical information. If you do not accept Cookies, however, you may not be able to use all portions of the Service or all functionality of the Service. If you have any questions about how to disable or modify Cookies, please let us know at the contact information provided below.

(d) **Changing or Deleting Your Personal Data.** You may change any of your Personal Data in your Account by editing your profile within your Account. You may request deletion of your Personal Data by us, and we will use commercially reasonable efforts to honor your request, but please note that we may be required to keep such information and not delete it (or to keep this information for a certain time, in which case we will comply with your deletion request only after we have fulfilled such requirements). When we delete any information, it will be deleted from the active database, but may remain in our archives. We may also retain your information for fraud or similar purposes.

(e) **Mobile Apps.** You can stop all collection of information by the Mobile App by uninstalling it. You may use the standard uninstall processes as may be available as part of your mobile device.

6. Security of Your Personal Data.

- ParkiFi is committed to protecting the security of your Personal Data. We use a variety of industry-standard security technologies and procedures to help protect your Personal Data from unauthorized access, use, or disclosure. We also require you to enter a password to access your Account information. Please do not disclose your Account password to unauthorized people. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, while ParkiFi uses reasonable efforts to protect your Personal Data, ParkiFi cannot guarantee its absolute security.

7. Changes to This Privacy Policy. This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Data, we will notify you by sending you an e-mail to the last e-mail address you provided to us and/or by prominently posting notice of the changes on our Apps. Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an e-mail notice to you or thirty (30) calendar days following our posting of notice of the changes on our Apps. These changes will be effective immediately for new users of our Service. Please note that at all times you are responsible for updating your Personal Data to provide us with your most current e-mail address. In the event that the last e-mail address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the e-mail containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit changes in our use of your Personal Data, you must notify us prior to the effective date of the changes that you wish to deactivate your Account with us. Continued use of our Apps or Service, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

8. Questions; Contacting ParkiFi; Reporting Violations. If you have any questions or concerns about our Privacy Policy or our data collection or processing practices, or if you want to report any security violations to us, please contact us at the following address or phone number:

ParkiFi, Inc.
Attn: Privacy
1451 Larimer Street
Denver, CO 80202

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