

Attenti

Privacy Policy of EM Manager

Privacy Policy

Effective date: July 1, 2019

Attenti ("us", "we", or "our") operates the EM Manager mobile application (the "Service").

We respect your right to privacy and are committed to protecting your privacy. This page informs you of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

We use your data to provide and improve the Service. By using the Service and submitting your information and data in connection with the Service, you indicate that you have read and understand this policy and agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Information Collection And Use

Types of Data Collected

Personal Data

We collect several different types of information for various purposes to provide and improve our Service to you. While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personal Data may include: (1) information that identifies you

directly, such as your first and last name, street address, or email address; and (2) other information, such as your IP address, device ID and/or serial number, and data from cookie and similar technologies that may be identified with you.

We may collect additional information about you as you engage with the Service, including your blood alcohol content, pictures of you while using the Service. In addition, we will request that you provide information about your mobile device, including location services.

Usage Data

When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, unique device identifiers, geolocation data, and other diagnostic data ("Usage Data").

Use of Data

Attenti uses the collected data for various purposes, including, but not limited to, the following:

- To provide and maintain the Service;
- To notify you about changes to our Service;
- To allow you to participate in interactive features of our Service when you choose to do so;
- To provide customer care and support and to follow up on and resolve your complaints regarding the Service;
- To provide an analysis so that we can improve the Service;
- To monitor your usage of the Service;

- To detect, prevent, and address technical issues;
- To administer services;
- To block and control disruptive use;
- To analyze and improve the services we offer;
- To inform you of significant changes to this Privacy Policy;
- To develop databases using information provided through the Service for research purposes; and
- To share, with affiliates and third parties, personal information that has been de-identified prior to any use or sharing, for statistical, analytical, or research purposes.

Transfer And Sharing Of Data

We may share information we collect about you within our organization.

Please note that in connection with your use of the Service, your personal information – including your identifying information, blood alcohol content, picture, and geographic location – may be shared with federal, state, county and/or local criminal justice agencies. Your information may also be shared with non-governmental agencies such as third-party businesses depending on the type of electronic monitoring program you are assigned. Again, you are responsible for ensuring the accuracy of information you provide through our Service. WE ARE NOT RESPONSIBLE FOR THE MISUSE OR INACCURACY OF ANY CONTENT OR INFORMATION UPLOADED OR TRANSMITTED THROUGH THE SERVICE.

Should we choose to sell or transfer business assets, or to engage in a transaction where it is required to share or transfer your information, it is possible that the information we possess, including your personal information, may be transferred as part of that transaction. We may decide to retain a copy of the information after the sale or transfer.

Attenti will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and we will not transfer your Personal Data to an organization unless there are adequate controls in place regarding the security of your data and other personal information.

Disclosure Of Data

Legal/Safety Requirements

On rare occasions, we may disclose your Personal Data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To respond to a governmental request, including a court order;
- To protect and defend our rights or property;
- To enforce our policies;
- To prevent or investigate possible wrongdoing in connection with the Service;
- To stop disruptive or abusive behavior by our users;
- To protect the personal safety of users of the Service or the public; and
- To protect against legal liability.

Security Of Data

We use commercially reasonable security technology to comply with the provisions of this Privacy Policy. The security of your data is important to us, but remember that no method of transmission over the Internet or method of electronic storage is 100% secure.

While we strive to protect your Personal Data, we cannot guarantee its absolute security.

Service Providers

We may employ third party companies and individuals to facilitate our Service ("Service Providers"), to provide the Service on our behalf, to perform Service-related services, to assist us in analyzing how our Service is used, or to otherwise provide support for our business operations, including but not limited to data verification, data storage, data analytics, technology support services and maintenance and security services. For some of these services, the Service Providers need your personal information in order to perform the service, such as verifying identity. For other services, the Service Providers may have technical access to your information but do not need or use the information in order to perform their services .

Service Providers may have access to your Personal Data only to perform certain tasks on our behalf and are obligated not to disclose or use it for any other purpose. We take commercially reasonable measures to select Service Providers who demonstrate their commitment to maintain privacy guidelines that are consistent with our Privacy Policy.

Application of this Privacy Policy

This Privacy Policy only applies to all information collected or submitted to us through use of the Service.

Changes To This Privacy Policy

We may change, modify, add, remove, or otherwise update our Privacy Policy from time to time in our discretion, without prior notification to you.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Consent to Processing Your Information in the U.S.

Your information, including Personal Data, may be transferred to — and maintained on — servers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction.

We operate in the United States and follow the information and consumer protection laws of the United States and its individual states, as applicable. If you reside or are located in a different country, the data protection laws of that country may differ in the ways your personal information is protected. When you interact with this Service, you signify to us that you consent to the transfer and processing of your personal information in the United States, in accordance with United States laws, as explained in this Privacy Policy.

Contact Us

If you have any questions about this Privacy Policy, please contact us by email at Contact@attentigroup.com.