# **Privacy Policy - ELi Technology**

Effective Nov 1, 2023

#### **General Information:**

Eli Technology ("us", "we", or "our") values the privacy of our customers, users, and any individual who accesses or uses the Eli/ATLS websites, portal, products, and services (collectively, the "Services"). Your privacy is an important factor ELi considers in the development of each of our products and services. This page outlines our policies regarding; collection, use, and disclosure of personal data when using our Service and the choices you have associated with that data.

We use your data to provide and improve our Services. By using the Service, you agree to the collection and use of information in accordance with this policy.

## **Definitions**

Service includes the Eli Technology and the Emergency Mobile Location (EML) service operated by ELi Technology.

**Personal Data** means data about a living individual who can be identified from that data (or from those and other information either in our possession or likely to come into our possession).

**Usage Data** is data collected automatically, generated using the Service.

**Data Controller** is the natural or legal person who (either alone or jointly, or in common with other persons) determines the purposes for which, and the manner in which, any personal information is or will be processed. For the purpose of this Privacy Policy, we are a Data Controller of your Personal Data.

**Data Processor (or Service Provider)** is any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various providers to process your data more effectively.

Data Subject (or User) is any living individual using our Service and is the subject of Personal Data.

# **User Consent**

By submitting Personal Data through our Sites, Application, Software, or Services, you agree to the terms of this Privacy Policy, and you expressly consent to the collection, use and disclosure of your Personal Data in accordance with this Privacy Policy.

#### Information Collection and Use

When using the Service, you may provide, and we may collect, what is generally called "personally identifiable information", or "personal information", this is information that specifically identifies an individual. For the purposes of this Privacy Statement, we refer to such information as "Personal Information."

## **Personal Information**

If the EML Service is supported in your country, or by your Mobile Network Operator, the Service will be automatically enabled when you trigger an alert on your device. When you use the EML Service, we collect verified location information from your device to determine your physical location.

#### **Outside of your Country**

Your Personal Data may be processed in the country in which it was collected and/or in other countries, where laws regarding the processing of Personal Data may be less protective than the laws in your country. By providing your data, you consent to such processing and transfer.

# Type of Data Collected

To make services operable and/or more useful to you, (which may be hosted by a third-party service provider), we may automatically collect information from your computer or device, including but not limited to:

During an Alert / Emergency or Call may includes:

- o Mobile phone number
- o GPS location coordinates (latitude, longitude, altitude) and updated location data as required
- WIFI access points data (i.e., TAG and / or BSSIDs #, installation descriptions)
- Location addresses of the nearby WIFI access points
- Mobile device battery reading
- o Date, start-time and last update time of the alert

# **During Onboarding**

- o Indoor building floor plans/room numbers/building layouts
- Building location and addresses
- o Customer/Partner information provided when creating accounts
- o Access point data and locations
- o Enrollment/employee numbers
- o Business contact numbers and emails

Note: In the event of an alert/emergency/test, other users within your group or Eli technology may be provided your Personal Data/location.

#### Use of Data

We use the data collected to provide EMI Services. Your location may be provided when you or others within your customer group trigger an Alert. Personal account data is used if required to improve or manage Eli services.

## **Tracking and Cookies Data**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies could be beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all cookie, or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Service.

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), ELi Technology's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

Eli Technology may process your Personal Data in accordance with GDPR Article 6 1. d. "processing is necessary in order to protect the vital interests of the data subject or of another natural person". Calling the emergency number, which automatically invokes our service, indicates that you need urgent help. Our service helps direct first responders to your location.

Do Not Track. We do not currently respond to "do not track" signals from web browsers during an emergency alert.

# **Retention of Data**

Eli Technology will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Eli Technology will also retain Usage Data for internal analysis purposes. Usage Data is retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **Transfer of Data**

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

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

Eli Technology will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place, including the security of your data and other personal information.

## **Disclosure of Data**

#### **Business Transaction**

If Eli Technology is involved in a merger, acquisition, or asset sale, your Personal Data may be transferred. In the event of such transfer, your Personal Data will become subject to a different Privacy Policy.

# **Disclosure for Law Enforcement**

Under certain circumstances, Eli Technology may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

# **Legal Requirements**

Eli Technology may disclose your Personal Data in the good faith belief that such action is necessary to:

- o To comply with a legal obligation.
- o To protect and defend the rights or property of ELi Technology.
- To prevent or investigate wrongdoing in connection with the Service.
- o To protect the personal safety of users of the Service or the public.
- To protect against legal liability.

# **Security of Data**

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 use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

#### **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 or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Our Services may contain links to third-party websites or applications. When you click on a link to any other website or application, you will leave our Services and go to another site or application and another entity may collect Personal Data or Anonymous Data from you. We have no control over, do not review, and cannot be responsible for, these outside websites, and applications and the terms of this Privacy Policy do not apply to any third-party collection of your Personal Data after you click on links to such outside websites or applications.

#### White Label Service

We may provide the Service as a white-label service to our partners. In this situation, we may share the information that you provide us to our partners and that information will be subject to such partner's privacy practices as well as our privacy policy. Our privacy practices may also be controlled by the contract we have with the white-label partner and such partner's privacy policy. If you have questions about our partner's privacy practices, we will refer you to our partner.

## **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time and will update the "effective date" at the top of this Privacy Policy.

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.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

Email: info@eli-technology.com