

Effective Date: April 20, 2016

XCOMPASS, INC.

PRIVACY POLICY

This Privacy Policy (“**Policy**”) describes how Xompass, Inc. (“**Company**” or “**Xompass**” or “**we**” or “**our**” or “**us**”) treats information collected or provided in connection with an end user’s (“**you**” or “**your**” or “**User**”) use of the Xompass website located at <http://www.xompass.com> (the “**Site**”). Please note that your use of the Site constitutes your acceptance of this Policy as set forth below.

1. Collected Information. The information collected during your use of the Site includes the following:

(a) Submitted Information. As part of using the Site, you may submit certain information to us. For example, when you fill out contact forms on the Site we will collect information from you that you submit, including Personal Information such as your first and last name and e-mail address. “**Personal Information**” means information such as a name or e-mail address that we can directly associate with a specific person or entity without additional information. To the extent you decline to share certain information with us, we may not be able to provide some or all of the features and functionalities found on the Site.

(b) Automatically Collected Information. When you use the Site, we gather certain non-personally identifiable information from you, and this information can be associated with your user account. This includes usage information, such as information on when, how often and for how long you use the Site, as well as server log data such as a computer’s IP address, browser type or the webpage you were visiting before you came to the Site.

(c) Xompass FaaS. When you log-in to your Xompass FaaS account through the Site, we collect your e-mail address and password and use it for purposes of verifying your account credentials. Please note that our handling of data that is received, stored and processed in connection with your use of Xompass FaaS is governed by our written agreement with you or your company (as applicable) regarding our provision of Xompass FaaS to you or your company, and not this Policy.

(d) Tracking and Cookies. The Site may use both web beacons and cookies to collect information. “Beacons” (also often referred to as “pixels”) are tiny graphics on a web page designed to track when a page is viewed. “Cookies” are small text files containing a string of alphanumeric characters that are downloaded by your web browser or mobile device when you visit a website. We may use both session cookies and persistent cookies when you access and use the Site. Cookies may be used, for example, to customize the interface of the Site for you and to assist us in measuring and analyzing Site traffic. 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 the Site. Persistent cookies can be removed. Please review your browser’s documentation to learn the best way to modify your cookie settings. Like many websites, the Site does not currently respond to “do not track” browser headers. However, you can take steps to limit tracking by erasing cookies from your computer’s hard drive and by setting your browser to block all cookies or warn you before a cookie is stored.

(e) Analytics. We use certain third party services to assist us in analysis, auditing, research, and reporting regarding the Site. These third parties may use web logs or web beacons, and they may set and access cookies on your computer or other device. In particular, we use

Google Analytics to help collect and analyze certain information for the purposes discussed in this Policy. You may opt out of the use of cookies by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

2. Use of Information. We internally use the information we collect as follows:

(a) Provision of Site. We may use collected information for the purposes for which you provided the information including, for example, responding to a question that you e-mail to us. We also use the collected information as necessary to provide the features and functionality of the Site to you and as reasonably necessary for our business operations.

(b) Updates and Troubleshooting. We may also use the collected information to contact you regarding updates or modifications to the Site or to help troubleshoot problems, or alert you to changes in our policies or agreements that may affect your use of the Site.

(c) Personalized Content. We may use the collected information to personalize the content that you and others see based on personal characteristics or preferences. For example, we may present promotional offers to you or determine the order of product presentation to you based on your expressed preferences.

(d) Analytics and Improvements. We may analyze collected information relating to your use of the Site in order to help us improve the Site and develop and improve other products and services.

(e) Promotional Offers. We may use the collected information to provide you with promotional materials and offers. However, we will give you the ability to opt out of receiving such e-mails in accordance with applicable law. We will not provide your Personal Information to third parties for their own marketing purposes without your consent.

(f) Combination. We may combine Personal Information collected through the Site with other information that we or third parties collect about you in other contexts—such as our communications with you via e-mail, phone, or your customer service records.

3. Disclosure of Information. We share and disclose the information we collect about you as follows:

(a) Third-Party Service Providers. We use contractors and third-party service providers to assist us in making the Site available. Such third-party contractors or service providers may obtain access to the information you provide, including Personal Information.

(b) Advertising. We may partner with third party advertising companies in order to serve online advertising regarding our products and services to users after they visit the Site. This is a common practice called “retargeting.” For more information on such practices, you may visit <http://www.aboutads.info>. For the ability to opt-out of such practices, you may visit <http://www.aboutads.info/choices/>.

(d) Aggregated Data. We may report aggregated, anonymous data relating to activity on the Site to third parties or the general public. By way of example only, this may include the provision or publication of reports regarding the geographical distribution of visitors to our Site.

(e) Business Arrangements. We may disclose non-personally identifiable information to third-party partners in furtherance of our business arrangements with them, including

without limitation to jointly offer a product or service to you or create interoperability between our products and services and the products and services of such partners.

(f) Transfer as Corporate Asset. In the event of a merger, sale of capital stock or assets, reorganization, consolidation or similar transaction involving Company, the information we possess, including Personal Information, shall be transferred as a corporate asset to the acquiring entity.

(g) Legal Requirement. We will use and disclose information where we, in good faith, believe that the law or legal process (such as a court order, search warrant or subpoena) requires us to do so or in other circumstances where we believe it is necessary to protect the rights or property of Company, our users and/or third parties.

(h) Affiliates. We may disclose this information to our affiliates for use as described in this Policy.

4. Effective Date; Changes. When we make any changes to our practices under this Policy, we will change the Effective Date. We will treat your continued use of the Site following such change as your acceptance of the changes.

5. Third Parties. The Site may contain offers from third parties or links to third-party websites. This Policy does not apply to information that you may provide to or that may be collected by third parties. We encourage you to request such third parties to provide you with their applicable privacy policies and other terms and conditions before engaging with or making a purchase from such third parties.

7. Security. The Personal Information we collect about you is stored in limited access servers. We will maintain reasonable safeguards to protect the security of these servers and your Personal Information. However, no security measures are 100% effective and we cannot guarantee the security of your Personal Information. We expressly disclaim any representation or warranty, whether express or implied, with respect to ensuring, guaranteeing or otherwise offering any definitive promise of security in connection with your personal information or usage information.

8. Children Under 13. We do not knowingly collect information from children under 13 and the Site is not directed at children under 18. If you are a parent and believe your child under the age of 13 has used the Site and provided Personal Information to us through the Site, please contact us at the phone number and address provided in Section 10 of this Policy and we will work to delete any such Personal Information.

9. Transfer to the U.S. or Other Countries. Company uses facilities in the United States. Your information will be stored and processed in the United States or other countries where Company has facilities. By using the Site, you consent to the transfer of information outside of your country, even if your country has more rigorous data protection standards.

10. Contacting Us. If you have any questions about this Policy, please contact us at [925-494-2255] or legal@xompass.com at:

Xompass, Inc.
Attn: Privacy Questions
777 Davis Street
San Leandro, CA 94577