

## **PRIVACY AND OTHER POLICIES**

**Effective Date: January 31, 2020**

Your privacy is important to us, as is being transparent about how we collect, use, and share Personal Information about you, as well as complying with relevant privacy laws and regulations, including the British Columbia Personal Information Protection Act and EU General Data Protection Regulation (GDPR). This Privacy Policy is intended to help you understand what Personal Information we collect about you, how we use and disclose such information, the steps we take to protect such information, and your rights regarding such information.

**Personal Information** is any information held by us which is related to an identified or identifiable natural person, including clients and employees, except business contact information or work product information. This Privacy Policy covers the Personal Information we collect about you when you use our products or services, or otherwise interact with us (for example, via our websites: life360innovations.com and mycontino.com, applications, email correspondence, marketing materials, and other online or downloadable tools), unless a different policy is displayed.

**Life360 Innovations, Life360, we** and **us** refers to Life360 Innovations Holdings Inc. and wholly or partially owned subsidiaries. We offer a range of products and services, delivered via our websites, and our Contino® Authorised Clinics. We refer to all of these products, together with our other services and websites as **Services** in this Privacy Policy.

By accessing or using our Services or interacting with any other aspect of our business, you consent to the collection, use, and sharing of Personal Information about you in accordance with this Privacy Policy. If you do not agree with this Privacy Policy, do not access or use our Services or interact with any other aspect of our business.

### **1. What Personal Information We Collect About You**

We collect Personal Information about you when you provide it to us, when you use our Services, and when other sources provide it to us, as further described below.

#### **a) Information You Provide To Us**

We collect Personal Information about you when you input it into the Services or otherwise provide it directly to us.

We collect Personal Information that you give us by filling in paper forms or data fields on our websites, or by corresponding with us by phone, email or otherwise. This includes information you provide to us when you complete a contact form, register on our website, or subscribe to Life360 Innovations communications, or purchase our products. The information you give us may include your name, year of birth, race and ethnicity, contact information (i.e. shipping address, email address, phone number, email), and contact preferences. To the extent necessary to process a payment, you may also give us certain of your financial information, including credit card information.

#### **b) Personal Information We Collect Automatically When You Use The Services**

When you use the Services, we (or a third-party designated by us) may automatically record certain Personal Information from your device by using various types of technology, including cookies, "clear gifs" or "web beacons." This automatically collected information may include your IP address or other device address or ID, web browser and/or device type, the web pages or sites visited just before or just after using the Service, the pages or other content you view or interact with on the Service, and the dates and times of the visit, access, or use of the Service. We also may use these technologies to collect information regarding your interaction with email messages, such as whether you open, click on, or forward a message. You may limit the automatic collection of certain information by our Service, for instance by disabling the cookies using your browser options. Please be aware that by doing so it may prevent you from using specific features on our Service, such as receiving newsletters. We use automatically collected information and other information collected on the Service through cookies and similar technologies to: (i) personalize our Services, such as remembering your information so that you will not have to re-enter it during a visit or on subsequent visits; (ii) provide customized advertisements, content, and information; (iii) monitor and analyze the effectiveness of Services and third party marketing activities; (iv) monitor aggregate site usage metrics such as total number of visitors and pages viewed; and (v) track your entries, submissions, and status in any promotions or other activities on the Services.

#### c) Personal Information We Receive From Other Sources

We receive Personal Information about you from other Service users, from third-party services, from our related companies, and from our business and channel partners.

- **Other users of the Services:** Other users of our Services may provide Personal Information about you. For example, we may receive your email address from other Service users when they provide it in order to refer you to the Services;
- **Life360 Partners:** We work with a global network of partners who provide consulting, implementation, training and other services around our products. Some of these partners also help us to market and promote our products, generate leads for us, and resell our products. We receive Personal Information from these partners, such as name, billing information, contact information, what products you may be interested in, evaluation information you have provided, what events you have attended, and what country you are in; and
- **Other Partners:** We receive Personal Information about you and your activities on and off the Services from third-party partners, such as advertising and market research partners who provide us with information about your interest in and engagement with our Services and online advertisements.

## **2. How We Use Personal Information We Collect**

We take steps designed to ensure that only those employees who need access to your Personal Information to fulfil their employment duties will have access to it. How we use the Personal Information we collect depends in part on which Services you use, how you use them, and any preferences you have communicated to us. We use Personal Information we hold about you only for permitted purposes, in accordance with applicable national or local data

protection laws and applicable provisions of the European General Data Protection Regulation (GDPR). Below are the specific purposes for which we use the Personal Information we collect about you:

- To operate, maintain, enhance and provide all features of the Services, to provide the Services and information that you request, to respond to comments and questions and to provide support to users of the Services;
- To understand and analyze the usage trends and preferences of our users, to improve the Services, and to develop new products, services, feature, and functionality;
- To provide information to competent regulatory authorities in geographies Life360 or its' partners operate, which support various regulatory submissions and reporting requirements;
- To verify accounts and activity, to monitor suspicious or fraudulent activity and to identify violations of Service policies;
- To review and assess your job application;
- To send you communications; or
- To comply with legal and regulatory requirements, where applicable.

Legal bases for processing (for EEA users)

If you are an individual in the European Economic Area (EEA), we collect and process Personal Information about you only where we have legal bases for doing so under the GDPR. The legal bases depend on the Services you use and how you use them. This means we collect and use your Personal Information only where:

- We need it to provide you the Services, including to operate the Services, provide customer support and personalized features and to protect the safety and security of the Services;
- It satisfies a legitimate interest (which is not overridden by your data protection interests), such as for research and development, to market and promote the Services and to protect our legal rights and interests;
- You give us consent to do so for a specific purpose;
- We need to process your data to comply with a legal obligation; or
- If you have consented to our use of Personal Information about you for a specific purpose, you have the right to change your mind at any time, but this will not affect any processing that has already taken place. Where we are using your Personal Information because we or a third party (e.g. your employer, your healthcare professional) have a legitimate interest to do so, you have the right to object to that use though, in some cases, this may mean no longer using the Services.

### 3. How We Share Personal Information We Collect

We may use collaboration tools and we want them to work well for you. This means sharing Personal Information through the Services and with certain third parties in the ways reviewed below. We may share or transfer Personal Information we collect under this Privacy

We share information with third parties that help us operate, provide, improve, integrate, customize, support and market our Services. When we disclose your Personal Information to third parties, we take reasonable measures to ensure that the rules set forth in this Privacy Policy are complied with and these third parties provide sufficient guarantees to implement appropriate technical and organizational measures for:

- **Service Providers:** We work with third-party service providers to provide website and application development, hosting, maintenance, backup, storage, virtual infrastructure, payment processing, analysis and other services for us, which may require them to access or use Personal Information about you;
- **Life360 Partners:** We work with third parties who provide consulting, sales, and technical services to deliver and implement solutions around the Services. We may share your Personal Information with these third parties in connection with their services, such as to assist with billing and collections and to provide localized support. We may also share Personal Information with these third parties where you have agreed to that sharing;
- **Links to Third Party Sites:** The Services may include links that direct you to other websites or services whose privacy practices may differ from ours. If you submit Personal Information to any of those third party sites, your Personal Information is governed by their privacy policies, not this one. We encourage you to carefully read the privacy policy of any website you visit;
- **Third-Party Widgets:** Some of our Services contain widgets and social media features, such as the Twitter "tweet" button. These widgets and features collect your IP address, which page you are visiting on the Services, and may set a cookie to enable the feature to function properly. Widgets and social media features are either hosted by a third party or hosted directly on our Services. Your interactions with these features are governed by the privacy policy of the company providing it;
- **Transactions:** We may share or transfer information we collect under this Privacy Policy in connection with any merger, financing, or sale of all or a portion of our business or assets to another company. We will notify you if a transaction takes place and advise you of any choices you may have regarding your information ; and
- **Compliance with Enforcement Requests and Applicable Laws; Enforcement of Our Rights:** In exceptional circumstances, we may share Personal Information about you with a third party if we believe that sharing is reasonably necessary to:
  - a) comply with any applicable law, regulation, legal process or governmental request, including to meet national security requirements,

- b) enforce our agreements, policies and Terms of Service,
- c) protect the security or integrity of our products and services,
- d) protect Life360, our customers or the public from harm or illegal activities, or
- e) Respond to an emergency which we believe in good faith requires us to disclose Personal Information to assist in preventing the death or serious bodily injury of any person.

#### **4. How We Store And Secure Personal Information We Collect**

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage third party service providers, including data hosting service providers. By using the Services, you consent to the transfer of Personal Information to countries outside your country of residence, including the United States, Canada and the United Kingdom, which may have different data protection rules than in your country. While such Personal Information is outside of your country of residence, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country. However, our practices regarding your Personal Information will at all times continue to be governed by this Privacy Policy and, if applicable, we will comply with the GDPR requirements providing adequate protection for the transfer of Personal Information from the EU/EEA to third country. While we implement safeguards designed to protect your Personal Information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others.

We will strive to ensure your Personal Information is accurate by updating our records based on the latest information available to us, including any corrections provided to us by you.

We have implemented physical, technological and administrative measures designed protect Personal Information, including restricted access to paper documents, password-protected access to electronic records and mandatory privacy training for employees.

#### **5. How Long We Keep Personal Information**

How long we keep Personal Information we collect about you depends on the type of information, as described in further detail below. After such time, we will either delete or anonymize your Personal Information or, if this is not possible (for example, because the Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further use until deletion is possible:

- Account information: We retain your account information for as long as your account is active and a reasonable period thereafter in case you decide to re activate the Services. We also retain some of your information as necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements, to support business operations, and to continue to develop and improve our Services. Where we retain information for Service improvement and development, we take steps to eliminate information that directly identifies you, and we only use

the information to uncover collective insights about the use of our Services, not to specifically analyze personal characteristics about you;

- **Marketing information:** If you have elected to receive marketing emails from us, we retain information about your marketing preferences for a reasonable period of time from the date you last expressed interest in our Services, such as when you last opened an email from us. We retain information derived from cookies and other tracking technologies for a reasonable period of time from the date such information was created.

## **6. How To Access And Control Your Personal Information**

You have certain choices available to you when it comes to your Personal Information. Below is a summary of those choices, how to exercise them and any limitations:

- **You have the right to request a copy of your Personal Information, to object to our use of your Personal Information (including for marketing purposes), to request the deletion or restriction of your Personal Information, or to request your Personal Information in a structured, electronic format.** Below, we describe the tools and processes for making these requests.
- **Your request and choices may be limited in certain cases:** for example, if fulfilling your request would reveal Personal Information about another person, or if you ask to delete Personal Information which we or your administrator are permitted by law or have compelling legitimate interests to keep. Where you have asked us to share data with third parties, for example, by integrating third-party health care providers, you will need to contact those third-party service providers directly to have your Personal Information deleted or otherwise restricted. If you have unresolved concerns, you may have the right to complain to a data protection authority in the country where you live, where you work or where you feel your rights were infringed;
- **Access and update your Personal Information:** If your Personal Information is inaccurate or incomplete, you have the right to request rectification of your Personal Information;
- **Deactivate of your account and or subscription:** If you no longer wish to use our Services, you may deactivate your Services account. Please contact [support@life360innovations.com](mailto:support@life360innovations.com). Please be aware that deactivating your account or cancelling your subscription does not delete your Personal Information;
- **Delete your Personal Information:** You have the right, under certain circumstances, to request deletion or removal of your Personal Information from our systems;
- **Request that we stop using your Personal Information:** In some cases, under the GDPR, you may ask us to stop accessing, storing, using and otherwise processing your Personal Information where you believe we don't have the appropriate rights to do so. For example, if you believe a Services account was created for you without your permission or you are no longer an active user, you can request that we delete your account as provided in this Privacy Policy. Where you gave us consent to use your Personal Information for a limited purpose, you can contact us to withdraw that consent, but this will not affect any processing that has already taken place at the time. You can also opt-out of our use of your Personal Information for

marketing purposes by contacting us, as provided below. When you make such requests, we may need time to investigate and facilitate your request. If there is delay or dispute as to whether we have the right to continue using your Personal Information, we will restrict any further use of your Personal Information until the request is honored or the dispute is resolved, provided your administrator does not object (where applicable);

- **Opt out of communications:** You may opt out of receiving promotional communications from us by using the unsubscribe link within each email, updating your email preferences by contacting us as provided below to have your contact information removed from our promotional email list or registration database. Even after you opt out from receiving promotional messages from us, you will continue to receive transactional messages from us regarding our Services. You can opt out of some notification messages by contacting us; and
- **Data portability:** Data portability is the ability to obtain some of your Personal Information in a format you can move from one service provider to another (for instance, when you transfer your mobile phone number to another carrier). Depending on the context, under the GDPR, this applies to some of your Personal Information, but not to all of your Personal Information. Should you request it, subject to applicable laws, we will provide you with an electronic file of your basic account information.
- **Assistance:** You may have the right to obtain assistance from the British Columbia Office of the Information & Privacy Commissioner, or a similar body in the relevant jurisdiction.

## **8. Our Policy Towards Children**

The Services are not directed to individuals under 18. We do not knowingly collect Personal Information from individuals under 18. If we become aware that an individual under 18 has provided us with Personal Information, we will take steps to delete such information. If you become aware that an individual under 18 has provided us with Personal Information, please contact [privacy@life360innovations.com](mailto:privacy@life360innovations.com).

## **9. Changes To Our Privacy Policy**

We may change this Privacy Policy from time to time. We will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice by adding a notice on the Services homepages, or by sending you an email notification. We encourage you to review our Privacy Policy whenever you use the Services to stay informed about our information practices and the ways you can help protect your privacy. If you disagree with any changes to this Privacy Policy, you will need to stop using the Services and deactivate your account(s), as outlined above.

## **10. Contact Us**

If you have any questions or comments about this Privacy Policy or your Personal Information, to make a correction request, to exercise any applicable rights, to make a complaint, or to obtain information about our policies and practices with respect to any service providers outside your country of residence, our Privacy Officer can be reached by mail or email using the following contact information:

E-mail: [privacy@life360innovations.com](mailto:privacy@life360innovations.com)

or

Mail: Life360 Innovations Holdings Inc.  
#1200 - 555 West Hastings St.  
Vancouver, British Columbia, V6B 4N6, Canada

Attention: Privacy Officer