

Effective Date: June 1, 2020

# Privacy Policy

## Introduction

Coros, Corp. and its affiliates (“Coros,” “we,” “us” and/or “our”) appreciates your interest in our website. Your privacy is important to us and we want you to feel comfortable visiting us. This Privacy Policy explains what information we collect about you, why we collect the information, and how we collect and use the information.

This Privacy Policy describes our collection, use, and disclosure of personal information from United States residents and is intended for individuals in the United States. If you live outside of the United States and choose to use the websites or mobile applications connected with this Privacy Policy, you understand that your information will be sent to and stored in the United States. By using any of our websites and mobile applications (collectively, the “Sites”) or otherwise providing Personal Information to us, you indicate that you have read and understood this Privacy Policy. If you do not agree with our privacy practices as described in this Privacy Policy, please do not use the Sites.

**California Consumer Privacy Act (CCPA):** Please note that we have adopted our Privacy Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this Privacy Policy.

## Table of Contents:

1. Categories of Personal Information We Collect
2. Sources of Personal Information
3. How We Use Personal Information
4. How We Share Personal Information
5. Cookies and Similar Technologies
6. How to Access and Control Your Personal Information
7. Additional Considerations

# 1. Categories of Personal Information We Collect

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household or device (“Personal Information”).

The Web Sites have collected, disclosed for a business purpose, and sold the following categories of Personal Information from Californians and Nevadans within the last twelve (12) months:

Category	Examples	Collected	Disclosed (Categories of Recipients)
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	YES (computing service providers, marketing service providers, analytics service providers)
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristic or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education status, employment status, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	YES	YES (computing service providers, marketing service providers, analytics service providers)

C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, or genetic information (including familial genetic information).	NO	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	NO
F. Internet or other similar network activity.	Browsing history, search history, or information on a Californian's or Nevadan's interaction with a website, application, or advertisement.	YES	YES (analytics service providers)
G. Geolocation data.	Physical location or movements.	YES	YES (analytics service providers)
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO	NO
J. Non-public education information	Education records directly related to a student maintained by an	NO	NO

(per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.		
K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	<b>NO</b>	<b>NO</b>

Please note that this table does not include personal information that falls under an applicable exclusion from the CCPA, such as certain employment and business-to-business information.

## 2. Sources of Personal Information

We obtain the categories of Personal Information listed above from the following categories of sources:

- **Directly from you.** We collect profile information and other content you voluntarily provide us, which may include:
  - User name and password
  - Contact information when you register on our Sites, such as your name, street address, phone number, and/or email address.
  - Any content or contributions you post in a public space on the Sites. This includes comments, videos and photos that you might submit. If you contact us through a social media site, we may collect your social media identifier.
  - Any information you provide in communications with us, such as via social media, e-mail or through participation in research activities.
  
- **Indirectly from you.** We collect information that is passively collected when you use the Sites, such as by our web servers, mobile applications, and by third party analytics tools we use:
  - Our system logs may record certain information about visitors to our Sites, including the web request, Internet Protocol ("IP") address, device and mobile

ad identifiers, browser information, interaction with the Sites, pages viewed, app usage, and other such information; we may collect similar information from emails you receive from us that can help us track which emails are opened and which links are clicked by recipients.

- We use certain cookies, pixel tags and other technologies to help us understand how you use the Sites and enable us to personalize your experience. To learn more about Coros's use of cookies, please see our Cookies and Similar Technologies section below.
- We may detect the physical location by, for example, using GPS information collected by mobile applications or location information shared by your web browser. We collect this information for purposes of enhancing or facilitating our services, such as enabling certain functionalities of the Sites that can provide you with information about promotions or relevant product information near you. We may use your device's physical location to better understand how our Sites and other services and functionality are being used. Please note that your location may be derived from your WiFi, Bluetooth, and other device settings. Please consult your device settings for further information.

### **3. How We Use Personal Information**

We use Personal Information for the following business purposes:

- to address technical administration of the Sites
- to improve your experience with our products and services
- to respond to your inquiries and fulfill your requests
- to communicate with you about programs
- to inform you about our brand, products, promotions, events or other promotional purposes
- to permit you to participate in social sharing, including live social media feeds
- to perform analytics, quality control, research, and determine the effectiveness of our Sites, mobile applications, and develop new products and services

We may also use Personal Information as we believe to be necessary or appropriate for certain essential purposes, including:

- to comply with applicable law and legal process
- to respond to requests from public and government authorities, including public and government authorities outside your country of residence
- to detect, prevent, or investigate potential security incidents or fraud
- to facilitate the functionality of our Sites

- to enforce our terms and conditions
- to protect our operations or those of our affiliates
- to protect our rights, privacy, safety or property, security and/or that of our affiliates, you or others
- to allow us to pursue available remedies or limit the damages that we may sustain

If you submit any Personal Information relating to other people in connection with the Sites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

## **4. How We Share Personal Information**

We may disclose your Personal Information to third parties for business purposes. When we disclose Personal Information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract.

To the extent permitted by applicable law, your Personal Information may be disclosed to the following categories of third parties:

- to our affiliates for the purposes described in this Privacy Policy
- to our third-party service providers who provide services such as website hosting, data analysis, IT services, processing or fulfilling orders
- to a third party in the event of any direct or indirect reorganization, including merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)
- to a third party where we either aggregate, anonymize, de-identify or otherwise strip data of all personally identifiable characteristics
- in connection with the essential purposes described above (e.g., to comply with legal obligations)

In the preceding twelve (12) months, Coros has not sold Personal Information, as that term is defined in the CCPA.

## **5. Cookies and Similar Technologies**

Coros uses cookies to record the preferences of visitors, to enable us to optimize the design of our Sites. Cookies are small files which are stored on your hard drive. They ease

navigation, and increase the user-friendliness of a web site. Cookies also help us to identify the most popular sections of our Sites. This enables us to provide content that is more accurately suited to your needs, and in so doing improve our service. Cookies can be used to determine whether there has been any contact between us and your computer in the past. Only the cookie on your computer is identified. Personal details can be saved in cookies, provided that you have consented to this, for example, in order to facilitate secure online access so that you not need to enter your user ID and password again. Most browsers automatically accept cookies. You can prevent cookies from being stored on your hard drive by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your hard drive at any time. The choices available, and the mechanism used, will vary from browser to browser. Such browser settings are typically found in the “options”, “tools” or “preferences” menu. You may also consult the browser’s “help” menu. For example:

- Cookie settings in Internet Explorer
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari

There are online tools available for clearing all cookies left behind by the web sites you have visited, such as [www.allaboutcookies.org](http://www.allaboutcookies.org). Usually, deletion of cookies will anonymize the information associated with the pixel and a web site will not receive any further associated information.

We use a tool called “Google Analytics” to collect information about use of this website. Google Analytics sets a cookie on your browser and only collects the IP address assigned to you on the date you visit this website, rather than your name or other identifying information. You can prevent your data from being collected and used by Google Analytics by installing the Google Analytics opt-out browser add-on. If you choose not to accept cookies, you can still visit our Sites, however this may result in a reduced availability of the services provided by our Sites.

Our website also may include plug-ins from “Vimeo.” When you visit one of our YouTube plug-in-enabled sites, you will also be connected to Vimeo servers. If you are logged into your Vimeo account, you allow Vimeo to associate your browsing behavior directly with your personal profile. You can prevent this by logging out of your Vimeo account.

## **6. How to Access and Control Your Personal Information**

Upon written request, Coros or its representatives will inform you by letter without delay what Personal Information is stored by us as defined by applicable law. Should such data be

incorrect, we will at your request correct that information for you, you also have the option of viewing, deleting or amending your Personal Information. If you are a resident of the State of California and upon a verified request, you may request:

- (1) the correction, update, or deletion (subject to certain exceptions) of your Personal Information,
- (2) the categories of Personal Information Coros has collected,
- (3) the categories of sources from which Coros has collected your Personal Information,
- (4) the business or commercial purpose(s) for collecting and disclosing your Personal Information,
- (5) a copy of your Personal Information retained by Coros, to be delivered in a structured, commonly used and machine readable format to review or to transfer or transmit to another entity without hindrance, to the extent that that is technically feasible,
- (6) the categories of third parties with whom Coros shares your Personal Information, and
- (7) the specific pieces of Personal Information Coros has collected about you.

Please note that under the CCPA, you have the right to opt-out of the sale of your Personal Information to third parties, however, Coros does not sell Personal Information, as that term is defined in the CCPA. Coros has no actual knowledge of any such sales with respect to individuals under 16 years of age.

We may need you to provide additional information to verify your request, such as providing certain data elements so that we can confirm they match the Personal Information already maintained by us. We will not use this additional information for anything other than handling your request. You may designate an authorized agent to make a request in certain circumstances on your behalf. Such authorized agent must be registered with the California Secretary of State. We endeavor to respond to all such requests within forty-five (45) days, although there may be a brief delay in processing a request while we verify that the request is valid and originates from you as opposed to an unauthorized third party. If we require more time, we will inform you of the reason and extension period in writing. We will not discriminate against you for exercising your rights.

Any of the above requests may be made by visiting our data request page or by contacting us at:

Attn: Data Protection  
Coros, Corp.  
3513 Edison Way,  
Menlo Park, CA USA 94025  
info@coros.net



## **7. Additional Considerations**

### **Careers**

The Sites may include a link to our Careers section. Any Personal Information submitted through that portion of the Sites, by upload or via e-mail, will be governed by our Job Applicant Privacy Agreement on our Careers page.

### **Security**

Coros uses reasonable technical and organizational security measures in order to protect the Personal Information we have under our control against accidental or intentional manipulation, loss, destruction and against access by unauthorized persons. Our security procedures are continually enhanced as new technology becomes available.

### **Other California Privacy Rights**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Sites that are California residents to request, once a year, certain information regarding our disclosure of Personal Information to third parties for their direct marketing purposes. We do not disclose Personal Information to third parties for their direct marketing purposes.

### **Do Not Track (DNT)**

At this time, we do not monitor or follow "Do Not Track" (DNT) signals.

### **Children's Online Privacy Protection Act (COPPA)**

Our Site is a general audience site that is not designed nor intended to collect Personal Information from children under the age of 18. Therefore, we do not knowingly collect or maintain any Personal Information from children under the age of 18. To respect the privacy of children and to comply with the Children's Online Privacy Protection Act, children under the age of 18 should not provide any Personal Information on this Site. We ask that parents

supervise their children while online. In the event we learn that we have collected Personal Information from a child under the age of 18, we will delete such Personal Information without undue delay.

### **Third Party Services**

Our Sites may contain links to other web sites or services on the internet which are owned and operated by third parties (the "Third Party Product(s)"). You acknowledge and agree that Coros is not responsible for the availability of, or the content located on or through, any Third Party Product. Any third-party content or a link to a Third Party Product is not an endorsement of that content or Third Party Product. If you choose to use a Third Party Product, your use will be governed by such third party's own terms or use and privacy policy. If you have any concerns regarding such links or the content located on such Third Party Products, you should contact the owner, operator or administrator of such Third Party Product.

### **Changes to This Information**

We reserve the right to modify this Privacy Policy at any time. Please review it occasionally to keep up to date on our privacy practices. If Coros makes changes to this Privacy Policy, the updated page will be posted in a timely manner and the date at the top of the Privacy Policy will reflect the date it was last updated.

**Last Review Date:** June 1, 2020