

OTW PRIVACY POLICY

On the Way, LLC respects your privacy. On the Way, LLC (together with its affiliates and subsidiaries, “OTW” or the “Company”) may offer, from time to time, mapping, GPS navigation, community based services, and/or other services, to users of the Sirca API (the “**Software**”) and service (together with the Software, the “**Service**”), whether via the Internet, a cellular device or otherwise and/or to users of an associated mobile application (the “**Application**”) (collectively referred to as the “**Services**”).

This Privacy Policy describes:

- the information that OTW collects from users;
- how that information is used by OTW; and
- the rights and options available to users.

This Privacy Policy is incorporated as part of the Terms of Use available at <https://sircanav.com/tos.html> (or such other URL as OTW may provide (the “Terms of Use” or the “Terms”).

Your use of the Services is subject to the Terms of Use, Copyright Policy and this Privacy Policy and indicates your consent to them.

The Services are not intended for use by persons under the age of 13. If you are under 13, you may not download or use the Services.

In this Privacy Policy, the term “personal information” means any information collected by us or provided by you that, with reasonable efforts, may be used to identify you, which may include first and last name, home address, email address and, in certain circumstances, your location and route information.

Contact OTW / Abuse reports

If you believe that your privacy has been compromised by any person, in the course of using the Services, then please contact OTW at: admin@sircanav.com.

You may send OTW other requests, responses, questions and complaints by email at admin@sircanav.com.

Information that is being collected

OTW may, from time to time, allow you to use the Services without choosing to set up a username for yourself. However, OTW may still link all of your information with your account and a unique identifier generated by OTW in accordance with this Privacy Policy. Note that in order to access certain features of the Services you may need to set up a username.

The categories of information collected by OTW will include all or just some of the following, depending on how you choose to use the Services.

Whenever you use the Services, OTW may collect:

detailed location and route information, for example in the form of GPS signals and other information sent by your mobile device on which the Application is installed and activated. OTW may use this

location and route information to create a detailed location history of all of the journeys you have made while using the Application; and

- information about your use of the Services. See “Meta-data that we collect”, below;

If you choose to use the Services in a manner detailed below, OTW may also collect:

- information that you choose to share with OTW, including a username you have chosen, reports associated with your username, destinations you may travel to, chat messages, search queries, calendar information. In addition, if you choose to opt in to the ‘find friends’ feature (if provided by OTW) OTW may collect:

- periodically, all of the phone numbers which are stored on your device’s phone book. This information will be used to help find and create a list of other OTW users who you may know and with whom you may wish to connect; and/or
- your phone number. Your phone number will be used to verify your account and to help find and create a list of other OTW users who you may know and with whom you may wish to connect;

- information required when setting up a username you have chosen, such as your name and gender. Bear in mind that false, incorrect, or out-dated information may impair OTW’s ability to provide you with the Services and to contact you when necessary. OTW may explicitly indicate particular fields for mandatory completion. If you do not enter the requisite data in these fields, you may not be able to set up a username; and/or

- information shared from your social network accounts. See “Integration with social networks,” below.

Please note that when you first install the Application on your mobile device, OTW may set up an account associated with you and/or your mobile device (the “Account”). OTW will collect and use your information, in accordance with this Privacy Policy, whenever you activate the Application. This use includes linking your information with your Account. This is the case irrespective of whether or not you choose to create an OTW username and password in the Application.

If you do set up an OTW username and password in the Application:

- OTW will link all of your information with your Account and that username. This may include information received from other mobile devices running the Application on which you have chosen to sign in; and
- your approximate location and/or other information you may choose to contribute may be visible to other users and may be associated with your username, depending on the features provided by OTW to users.

If you do not set up an OTW username and password in the Application (by skipping the username setup stage of the application installation process, if permitted):

- OTW may still link all of your information with your Account and a unique identifier may be generated by OTW; and

- your approximate location and/or other information you may choose to contribute may be visible to other users and may be associated with your username, depending on the features provided by OTW to users.

Uses of information

OTW may use information collected from or provided by you for the following purposes:

- to provide you with the Services. For example, OTW may:
 - use your location and route information and/or search query history to provide services and to provide information and advertisements about sites, shops and other places and attractions in your close vicinity, or that we believe, based on your search query history and/or other factors, you may find interesting;
 - OTW may provide information collected from or provided by you to our service providers that help us provide you with the Services, and they may make further use of the data which may be governed by their separate privacy policies; and
 - (if you have opted in to the ‘find friends’ feature, if provided), use your phone number and the phone numbers which are stored in your device’s phone book to find and create a list of other OTW users who you may know and with whom you may wish to connect.
- to operate the Services and to improve and customize your experience with the Services. For example, OTW may use your “home” and “work” information (if provided) or location history to offer routes based on how you’ve chosen to travel between destinations in the past;
- to improve the experience of other users. For example, OTW may use your route information to improve the accuracy of its mapping and navigation data;
- to provide you with support and handle requests and complaints;
- to send you updates, notices, announcements, and additional information related to the Services;
- to display or send to you marketing and advertising material when you are using the Application, in accordance with the section titled ‘Advertising Campaigns’ under this Privacy Policy. For example, OTW may use your location information to display advertisements for businesses in your close vicinity;
- subject to your prior indication of consent, we may also use the email address that you provide when setting up a username to send you marketing material. At any time you may choose not to receive such material by clicking on the “Unsubscribe” link in the e-mail messages that we may send to you;
- to create aggregated and/or anonymous data (where such data does not enable the identification of a specific user). See “How does OTW use aggregated information,” below;
- to conduct surveys and questionnaires;
- to share your submissions with other users of the Services and to facilitate communication between you, OTW and other users;
- to enforce the Terms of Use;

- to contact you when OTW believes it to be necessary;
- to comply with any applicable law and assist law enforcement agencies under any applicable law, when OTW has a good faith belief that OTW's cooperation with the law enforcement agencies is legally mandated or meets the applicable legal standards and procedures;
- to prevent fraud, misappropriation, infringements, identity theft and other illegal activities and misuse of the Services;
- to handle breakdowns and malfunctions;
- to take any action in any case of dispute, or legal proceeding of any kind between you and the Service, or between you and other users or third parties with respect to, or in relation with the Service;
- for purposes provided under this Privacy Policy and the Terms of Use.

Please note that the username you choose will be used to identify you when you use the Services. Your username will be included along with any information you submit for posting. It will therefore be visible to others. In some instances, OTW may provide options to permit you to selectively control the visibility of certain information. However, such information will continue to be collected by OTW for the purposes listed in this Privacy Policy.

You may also provide additional information that will be used to personalize the Services and enhance your experience with the Services. For example, if you provide us with such information, additional services may be provided from time to time, using the additional information in additional ways. For instance, if OTW provides a facility for you to input your "home" and "work" information, we may provide you with what we think is the shortest route between those locations.

Further information may be collected when OTW exchanges communications with you, for example, if you submit a request, contact OTW's support team, or report a violation to the abuse team.

Personal information that you share

The Services may include a community of users publicly sharing information with OTW and with other members of that community.

In particular, users may choose to share personal information such as name, age, gender, picture, their location information, reports, reviews, and/or other information, as may be enabled from time to time. This information may be shared either directly to the Service and to other users. This information may also be shared via third party services (such as social networks) which interact with the Service upon such users' choice.

The content that you share is neither private nor confidential and you should not have any expectation of privacy with respect to it. Information you upload will be posted along with other personal information you make available to OTW. Therefore, you must exercise caution and common sense when

submitting information. At the very least you should demonstrate the same degree of caution as when publishing personal information by means other than the Internet and cellular services.

You can decide whether or not to upload content to the Services. However any content that you submit for posting, may be viewed by all users of the Services and by OTW.

In any event (but except as detailed below with respect to information shared from your social network accounts according to your privacy settings for such social network accounts), OTW endeavors to protect your email address so that it will not be visible to others through any reports or user posts that you share or upload.

We, at OTW, take great measures to provide you with the best experience you can have while using the Service. However, OTW has no control over the conduct of any user and disclaims all liability in this regard. Users are advised to carefully and thoroughly consider whether or not to make public or available any information and carefully examine all necessary details related to any communication with other users prior to any engagement or communication being made.

Participating in any user's activities as a result, directly or indirectly, from using OTW, is entirely at your own risk. OTW is not a party to any agreement entered into between the users in any circumstances. The user has the sole and ultimate responsibility regarding compliance with all laws, regulation or any other duty. We do not accept any liability for any loss, damage, cost or expense that you may suffer or incur as a result of or in connection with your participation in any activity or event initiated, held or conducted by a user or a third party nor in connection to any agreement between the users or third parties, including any activity or event related in any way, directly or indirectly, the Services or the use thereof.

Integration with social networks

You may choose to share information between your Account and your social network account (such as Facebook), if such features are enabled by OTW. Through this option, you may choose to have personal information and other content about you available from social networks, transmitted and shared through the Services. Similarly, you may choose to have personal information and other content about you available from OTW, including your location and route information, transmitted to and shared through your social network account.

By setting your Account to integrate with social networks, you agree to share information (including personal information) between OTW and such social networks, for the purposes provided under this Privacy Policy.

The social network's use of information made available by OTW is governed by that social network's privacy policy and controlled by the social network, not by this Privacy Policy or OTW.

When you connect to the social network account through the Services or otherwise make the Services interact with your social network account, you thereby permit the social network to share your personal information stored on such social network with the Services. We endeavor to collect your information from your social network account only in accordance with your privacy settings you have set up under your social network accounts.

Accordingly we endeavor to collect only such information which you allowed the social network(s) to share with third parties (such as your name, email address, list of friends, profile picture, other information you make publicly available via the applicable social network). You understand that the Services may access, make available and store (if applicable) such information so that it is available on and through your Account.

Please note that certain information which you have defined as private on your third party social network accounts may become public to other OTW Users through the Services if you have defined such information to be public on the Services. For example, if you designate your social network username as “private” in your social network account (to the extent possible under said settings), but have elected to set your OTW account settings as public, then the username may become public on the OTW service.

Meta-data that we collect

OTW collects information about the use of the Services. For example, OTW may record the frequency and scope of your use of the Services, the duration of your sessions, information about the device on which you have installed the Application, the web pages that you visit via the Services, information that you read, content that you use or create, advertisements that you view or click on, your communications with other users and third parties, the Internet protocol (IP) address and the name of the domain that serve you to access the Services, and the geographic location of the computer system that you are using to log-in or access the Services.

Accessing the Services

In order to access certain features of the Services, you may need to set up a username; however, OTW may also establish and require from time to time additional or different means of identification and authentication for logging in and accessing the Services or for accessing certain features or designated sections of the Services.

Your log-in details are your responsibility. You are fully accountable for any use or misuse of your Account and personal details as a result of conveying your details to someone else. You must maintain your log-in details in absolute confidentiality and avoid disclosing them to others. Make sure that you change your password frequently and at least once every six months.

Sharing information with others

OTW will not share your personal information with others, without your consent, except for the following purposes and to the extent necessary in OTW’s good-faith discretion:

- as necessary for the operation of the Services;
- If OTW reasonably believes that you have breached the Terms of Use, or abused your rights to use the Services, or performed any act or omission that OTW reasonably believes to be violating any applicable law, rules, or regulations. OTW may share your information in these cases, with law enforcement agencies and other competent authorities and with any third party as may be required to handle any result of your wrongdoing;

- If OTW is required, or reasonably believes that it is required by law to share or disclose your information;
- In any case of dispute, or legal proceeding of any kind between you and OTW, or between you and other users with respect to, or in relation with the Services;
- In any case where OTW reasonably believes that sharing information is necessary to prevent imminent physical damage or damage to property;
- If OTW organizes the operation of the Services within a different framework, or through another legal structure or entity, or if OTW is acquired by, or merged into or with another entity, or if OTW enters bankruptcy, provided however, that those entities agree to be bound by the provisions of this Privacy Policy, with respective changes taken into consideration;
- For facilitating the Service and to store your data on servers located in the U.S.A and the European Union.
- To collect, hold and manage your personal information through cloud based or hosting services or a third party or a party affiliated or connected to OTW, as reasonable for business purposes, which may be located in countries outside of your jurisdiction, including but not limited to the United States of America.
- OTW may also share personal information with companies or organizations connected or affiliated with OTW, such as subsidiaries, sister-companies and parent companies, or companies or organizations under contracts with OTW, such as third-party marketers. Personal information may also be shared with OTW's other partners and service providers to process it for us, based on our instructions and in compliance with this policy and any other appropriate confidentiality and security measures.

Controlling your personal information

If you find that the information associated with your Account is not accurate, complete or updated, then you must make all necessary changes to correct it. Please keep in mind that false, incorrect, or outdated information may impair the ability to provide you with Services.

How does OTW use aggregated information?

OTW may use anonymous, statistical or aggregated information (including anonymous location information), in a form that does not enable the identification of a specific user, to properly operate the Services, to improve the quality of the Services, to enhance your experience, to create new services and features, including customized services, to change or cancel existing content or service, and for further internal, commercial and statistical purposes.

OTW may also use anonymous, statistical or aggregated information collected on the Services, in a form that does not enable the identification of a specific user, by posting, disseminating, transmitting or otherwise communicating or making available such information to users of the Services, to the Services' providers, partners and any other third party.

Cookies

OTW may use cookies on the Services. Cookies are packets of information sent by the Website's servers to your web browser and then sent back by the browser each time it accesses the Website's servers.

OTW may use cookies for various purposes, such as to save you the need to re-enter your username and password each time you log-in, to facilitate the use of the Website, to collect statistical information, to verify information, and to customize the Website to your personal preferences and for information security purposes.

Some of the cookies may expire when the session ends and you exit your browser. Other cookies are saved on your computer's hard drive. If you wish to block the Website's cookies, then please use the help button in your browser and follow the necessary instructions. However, bear in mind that disabling cookies may complicate or even prevent your use of the Website, or certain features thereof.

Advertising campaigns

OTW may permit, solicit or contract certain other companies to conduct advertising campaigns on the Services.

The information and advertisements that you see when accessing the Services may be targeted on the basis of data available to OTW and/or other companies. You hereby agree that we may provide such information and advertisements targeted on the basis of data available to OTW and/or other companies.

When you visit a third party website from the Application, such third party may use cookies on your computer. The third party's use of cookies is subject to their own privacy policies and not to this Privacy Policy. If you wish to study the privacy policies of those third parties you should visit their services, or contact them directly.

The Service may include an internal messaging system, such as to provide you the ability to send and receive messages to and from other users, and to receive marketing messages from us. You hereby agree that we may use the internal messaging system for the purpose of informing you regarding products or services, which may interest you.

Please note however that other OTW users are not allowed to use your contact details or our internal messaging account for commercial advertising purposes. If you have encountered any user generated advertising material, please inform us. OTW does not accept any liability for any loss, damage, cost or expense that you may suffer or incur as a result of or in connection with any user's advertising material.

It is clarified that we are not responsible for the content of said advertisements and the products delivered or services rendered thereby by third parties and you irrevocably and unconditionally agree that we shall not be held responsible or liable in connection thereof.

Information Security

OTW considers information security to be a top priority. OTW implements systems, applications and procedures to secure your personal information, to minimize the risks of theft, damage, loss of

information, or unauthorized access or use of information. However, these measures are unable to provide absolute assurance. Therefore, although OTW takes great efforts to protect your personal information, OTW cannot guarantee and you cannot reasonably expect that OTW's databases will be immune from any wrongdoings, malfunctions, unlawful interceptions or access, or other kinds of abuse and misuse.

Changes to this Privacy Policy

OTW may from time to time change the terms of this Privacy Policy. Substantial changes will take effect immediately after OTW has posted a:

- **system message to users notifying them of changes to the Privacy Policy; and/or**
- **notification on the Website's homepage or any other relevant web pages, explaining the changes to the Privacy Policy alongside a comparison of the "old" and "new" versions of the Privacy Policy; and/or**
- **a revised copy of the Privacy Policy incorporating the changes.**

You agree to be bound by any of the changes made in the terms of this Privacy Policy. Continuing to use the Services will indicate your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Services.

Last modified: 10/31/19