

CITYFRONT EXPERIENCE

PRIVACY POLICY

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CityFront Experience is a platform that provides the ability for citizens, employees and other stakeholders of a smart city to aggregate such smart city's data and systems in a unified mobile experience through a white-labeled mobile application (the "Application"), any website(s) (collectively, the "Website"), and/or any other digital platform or application accessed by its users (the "Platform" and together with the Application and/or Website, the "CityFront Service"). The CityFront Service is owned and operated by CityFront Innovations, LLC, a Delaware limited liability company ("CityFront", "we" or "us").

Your use of the CityFront Service is subject to the terms and conditions set forth in this Privacy Policy (the "Privacy Policy").

PLEASE READ THIS PRIVACY POLICY CAREFULLY. BY ACCESSING OR USING THE CITYFRONT SERVICE, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND AGREE TO BE BOUND TO ALL THE TERMS OF THIS PRIVACY POLICY AND OUR TERMS OF SERVICE. IF YOU DO NOT AGREE TO SUCH TERMS, EXIT THIS PAGE AND DO NOT ACCESS OR USE THE CITYFRONT SERVICE.

We are committed to respect and protect the privacy of the personal information we obtain from you through the CityFront Service and we have created this Privacy Policy to inform you about how we collect, use and share your personal information, and about our privacy practices in general.

We are always ready to address your questions and concerns regarding this policy and our privacy practices. If you would like to contact customer service, please contact us via our website at <http://cityfront.ai/contact-us/> or email us at info@cityfront.ai.

We continually strive to find new ways to enhance your experience with the CityFront Service and we may modify this Privacy Policy from time to time to reflect changes in our privacy practices. You are encouraged to review this Privacy Policy periodically and to check the "Last Updated" date at the top of the Privacy Policy for the most recent version. If we make changes to this Privacy Policy, we will notify you here, by email, or by means of notice through the Website, the Application, or any other part of the CityFront Service.

1. Terms of Service. Use of the CityFront Service is subject to the terms of our Terms of Service found at <http://cityfront.ai/app-support/cityfront-experience-privacy-policy/>, which is hereby incorporated and made part of this Privacy Policy. By using the CityFront Service, you agree to be bound by our Terms of Service.

2. Types and Uses of Collected Information. CityFront collects two types of information

about you:

a. Personal Data. Personal Data is information that identifies a specific person. When you engage in certain activities via the CityFront Service, including but not limited to creating an account, sending feedback, or otherwise participating in the CityFront Service (collectively, “Identification Activities”), we may ask you to provide certain information about yourself. If you elect to engage in an Identification Activity, however, we may ask you to provide us with certain personal information about yourself, such as your name, address (including zip code), age, gender, email address and/or mobile phone number. When you enroll in the CityFront Service. Depending on the Identification Activity, some of the information we ask you to provide may be identified as mandatory and some identified as voluntary. If you do not provide mandatory information for a particular Identification Activity, you will not be permitted to engage in that Identification Activity with the CityFront Service. Depending on the Identification Activity, CityFront may not re-ask you for Personal Data if such are already stored with us.

As you navigate the CityFront Service, we may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons (“Web Site Navigational Information”). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the CityFront Service (such as the Web pages viewed and the links clicked).

We may use Personal Data to provide products and/or services to you, administer a newsletter, sweepstakes and contests, enhance the operation of the CityFront Service, improve our marketing and promotional efforts, analyze use of the CityFront Service, improve the CityFront Service, and tailor your experience with third parties as provided below in this Privacy Policy. We may also use Personal Data to troubleshoot, resolve disputes, accomplish administrative tasks, contact you, enforce our agreements with you, including our Terms of Service and this Privacy Policy, comply with applicable law, and cooperate with law enforcement activities.

For some portions of the CityFront Service, credit or debit card account information may be required. By submitting your card information through our sites, you agree to the sharing of this information with third-party payment processors or the applicable third-party. We provide card information to our third-party payment service providers or such third party solely to process your order. We do not store any card information ourselves. However, these third-party payment services or third parties may store your card information in accordance with their privacy policies. You should acquaint yourself with their policies.

We also can obtain information from third-party services, for example, from social networks. You give us permission to access such information when you link your social network accounts with CityFront. Sharing of such information may depend on your settings in social networks or their policies. If you use such third-party services you understand that we may obtain information from your accounts. When you use third-party services to register on our sites, you will be asked for specific authorization for access to such information. We will not collect such

information without your permission.

We may also obtain information from other sources, such as third-party applications, services, sites that you use to connect to our sites. We may combine that information with information we collect on our sites.

b. Non-Personal Data. Non-Personal Data is information that does not identify a specific person. This type of information may include things like the Uniform Resource Locator (“URL”) of the website you visited before coming to the CityFront Service or otherwise participating in the CityFront Service, the URL of the website you visit after leaving the CityFront Service, the type of browser you are using, mobile carrier information, mobile device information, or general and/or aggregated location data that does constitute Personal Data. We, and/or our authorized Third Party Service Providers, may automatically collect this information when you visit or use the CityFront Service through the use of electronic tools like Cookies and Web beacons or Pixel tags, as described below in this Privacy Policy. Most of the other information we collect for mobile, such as your mobile device identification and mobile device type, the request type, your mobile carrier, your mobile carrier user identification, and the content of your request, does not by itself identify you to CityFront, though it may be unique or consist of or contain information that you consider personal.

We use Non-Personal Data to troubleshoot, administer the CityFront Service, analyze trends, gather demographic information, comply with applicable law, and cooperate with law enforcement activities. We may also share this information with our authorized Third Party Service Providers to measure the overall effectiveness of our products and services.

We may use collected information to provide you with services, reserve and purchase your bookings on our sites. We may use information for ensuring the safety of the CityFront Service, services, features, content, environment, third parties. We may use information for protecting the copyright, any kind of property rights of CityFront, our users, and third parties.

3. Release of Personal Data. We will not sell or share your Personal Data with other parties except as provided below:

a. Authorized Third Party Service Providers. CityFront may provide products and services through third parties. These “Third Party Service Providers” perform functions on our or your behalf. You or We may share your Personal Data with such Third Party Service Providers to fulfill orders, analyze data, operate the CityFront Service including receiving payments, troubleshoot and provide customer service. We may also provide personal information to individuals and companies with whom we have business relationships and may share your information with Third Party Service Providers to accomplish our administrative tasks. However, the use of your Personal Data by such parties is governed by the privacy policies of such parties and is not subject to our control.

b. Remarketing. Remarketing is a way for us to connect with people, based upon your past interactions with the CityFront Service. Third-party marketing vendors may be hired

by CityFront to perform remarketing services. As a result, third-party vendors, including Google, may show CityFront ads on sites on the Internet. Third-party vendors may use cookies to serve ads based on a user's prior visits to the CityFront Service. Users may opt out of Google's use of cookies by visiting the Google advertising opt-out page at http://www.google.com/privacy_ads.html.

c. Acquisition. As with any other company, we could merge with, or be acquired by another company. If this occurs, the successor company would acquire the information we maintain, including Personal Data. However, Personal Data would remain subject to this Privacy Policy.

d. As required by law. We reserve the right to disclose your Personal Data as required by law and when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, or legal process served on us, enforce or apply this Privacy Policy, Terms of Service or other agreements or protect the rights, property or safety of the CityFront Service, users of the CityFront Service or others.

4. Release of Non-Personal Data. We may disclose or share Non-Personal Data with Third Party Service Providers and the general public. For example, we may share aggregated demographic information (which does not include any Personal Data) or use Third Party Service Providers to track and analyze Non-Personally Identifiable usage and volume statistical information from our users to administer the CityFront Service. We may also publish this aggregated information for promotional purposes. Such data is collected on our behalf, and is owned and used by us.

We may use Third Party Service Providers to serve ads when you participate in the CityFront Service. These companies may use Non-Personal Data about your visits and use of the CityFront Service, and visits to other websites or locations in order to provide, through the use of network tags, advertisements about goods and services that may be of interest to you.

5. Updating Information. If you are enrolled in the CityFront Service, you may change any of your Personal Data by logging into your account and accessing the profile area of the app from the menu. We encourage you to promptly update your Personal Data if it changes, as out-of-date Personal Data may negatively affect the quality of your CityFront Service experience.

6. Choices on Collection/Use of Information. You can always choose not to provide certain information, although a certain level of information is required to engage and participate in the CityFront Service. You cannot opt-out of Administrative Emails. "Administrative Emails" relate to your activity on the CityFront Service, and include but are not limited to emails regarding your account, requests or inquiries, and purchases of products and services. If you do not want to receive promotional emails from us, you may elect to opt-out of receiving promotional emails at any time after registering by e-mailing us at info@cityfront.ai with subject of the email being "Opt-out of emails" or by hitting the "unsubscribe" button at the bottom of any of our e-mails. If you would like to delete your profile, please contact our technical support

at support@cityfront.ai and we will assist you. If you do not want to give us your location information, you should check settings on your mobile devices. However, if you do so, this could also affect your services on the CityFront Service.

7. Security of Information. You can access your Personal Data via the CityFront Service with your password and username. This password is encrypted. We advise against sharing your password with anyone. If you access your account via a third-party site or service, you may have additional or different sign-in protections via that third-party site or service. You need to prevent unauthorized access to your account and Personal Information by selecting and protecting your password and/or other sign-in mechanism appropriately and limiting access to your computer, browser, or mobile device by signing off after you have finished accessing your account. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. In the event that we believe that the security of your information may have been compromised, we may seek to notify you of that development. In addition, your Personal Data resides on a secure server that only selected personnel and contractors have access to. We may encrypt certain sensitive information using Secure Socket Layer (SSL) technology to ensure that your Personal Data is safe as it is transmitted to us. However, no data transmission can be guaranteed to be 100% secure. As a result, while we employ commercially reasonable security measures to protect data and seek to partner with companies that do the same, we cannot guarantee the security of any information transmitted to or from or via the CityFront Service, and we are not responsible for the actions of any third parties that may receive any such information.

8. Data Tracking

a. Cookies. To facilitate and customize your experience with the CityFront Service, we may store cookies on your computer or other similar device through which you access the CityFront Service. A cookie is a small text file that is stored on your computer or other device for record-keeping purposes that contains information about you. We use cookies to save you time while using the CityFront Service, remind us who you are, and track and target your interests in order to provide a customized experience. Cookies also allow us to collect Non-Personal Data from you, like which pages you visited, what links you clicked on, and how you used the CityFront Service. We may use Third Party Service Providers to display advertisements on the CityFront Service. As part of their service, they may place separate cookies on your computer or similar device. We have no access to or control over these cookies. This Privacy Policy covers the use of cookies by the CityFront Service only and does not cover the use of cookies by any Third Party Service Provider. Most browsers automatically accept cookies, however you may be able to modify your browser settings to decline cookies. Please note that if you decline or delete these cookies, some parts of the CityFront Service may not work properly.

b. Other Tracking Devices. We may use other industry standard technologies like pixel tags and web beacons to track your use of the CityFront Service, or we may allow our Third Party Service Providers to use these devices on our behalf. When you access the CityFront Service or open or click an email, pixel tags and web beacons generate a Non-Personally

Identifiable notice of that action. Pixel tags allow us to measure and improve our understanding of visitor traffic and behavior on the CityFront Service, as well as give us a way to measure our promotions and performance. We may also utilize pixel tags and web beacons provided by our marketing partners for the same purposes.

9. Privacy Policies of Third Party Websites. This Privacy Policy only addresses the use and disclosure of information we collect from you via the CityFront Service. Other websites or services that may be accessible through the CityFront Service may have their own privacy policies and data collection, use and disclosure practices. If you use, link or visit any such website, we urge you to review the website's privacy policy. We are not responsible for the policies or practices of third parties. Visitors should be aware that CityFront often provides links to resources that we believe may be useful and visitors will be redirected to other sites. Please be aware that we are not responsible for the content or privacy practices of other sites. We encourage our users to be aware when they leave our site and to read the privacy statements of any other site that collects Personal Data. CityFront may use third parties, such as ad server companies, to present or serve advertisements that you may see on our website. Our privacy policy does not cover any information collected by those third parties nor does it cover how they may use such information.

10. Privacy Settings. As a user, you may have limited access to privacy settings. These settings help hide information you wish to share with other users and/or the public. It is up to you to select the appropriate privacy settings. If you don't agree with the available privacy settings, please stop using the CityFront Service.

11. Public Areas. We may provide areas on the CityFront Service where you can publicly post information about yourself or can communicate with others such as on forums. This information may be accessible by other users and companies and may appear on other websites or web searches, and therefore this information could be read, collected, and used by others. We have no control over who reads your postings or what other users may do with the information you voluntarily post, so please use caution when posting any content or providing anything that could be deemed personal information.

12. Notice of Privacy Rights to California Residents. California law requires that we provide you with a summary of your privacy rights under the California Online Privacy Protection Act ("COPPA") and the California Business and Professions Code. As required by COPPA, we will provide you with the categories of Personal Data that we collect through the CityFront Service and the categories of third party persons or entities with whom such Personal Data may be shared for direct marketing purposes at your request. California law requires us to inform you, at your request, (1) the categories of Personal Data we collect and what third parties we share that information with; (2) the names and addresses of those third parties; and (3) examples of the products marketed by those companies. COPPA further requires us to allow you to control who you do not want us to share that information with. To obtain this information, please send a request by email or physical mail to the address found below. When contacting us, please indicate your name, address, email address, and what Personal Data you do not want us to share with our marketing partners. The request should be sent to the attention of our legal

department, and labeled “California Customer Choice Notice.” Please allow 30 days for a response. Also, please note that there is no charge for controlling the sharing of your Personal Data or requesting this notice.

13. Children. The CityFront Services are not directed to people under the age of 18. If you become aware that your child has provided us with personal information without your consent, please contact us at info@cityfront.ai. If we become aware that a child has provided us with personal information, we take steps to remove such information and terminate the child’s account.

14. Customer Service. For assistance or questions regarding this Privacy Policy or the CityFront Service, you may contact us at info@cityfront.ai.