

Privacy Policy

We are committed to providing you notice about how Saira 2.0 LLC dba The IOT Solutions and “gu-yoyo” its trademark (including any subsidiaries or affiliates of Saira 2.0 LLC, collectively, IOT Solutions/”gu-yoyo” or “we”, or “us”, or “our”) handle your information. This IOT Solutions/”gu-yoyo” Privacy Policy (the “Privacy Policy”) applies to the information, that we collect and process about users of our Services, and those who communicate with us about our Services, interact with us on social media, attend our events, participate in our surveys, contests and promotions, or are subscribed to our marketing and informational communications (the “Interactions”). In this Privacy Policy, “Services” means:

- IOT Solutions/”gu-yoyo” websites that link to this Privacy Policy, including any versions optimized for viewing on a mobile device (the “Sites”),
- IOT Solutions/”gu-yoyo” mobile applications (each an “App”),
- IOT Solutions/”gu-yoyo” Electric Kick Scooters and Bicycles, and
- the features and services available through our Sites, Apps, Electric Kick Scooters and Bicycles

We have established this Privacy Policy to let you know the kinds of information we may gather during your use of the Services and related other Interactions, how we use your information, when we might disclose your information, and your rights and choices regarding your information that we collect and process.

IOT Solutions/”gu-yoyo” provides our Services to users throughout the Territory of Guam. IOT Solutions/”gu-yoyo” (located at 150 Addeng St. Suite 101 Dededo, Guam 96929) is the data controller for the personal data collected from users in the Guam Area.

1) THE INFORMATION WE COLLECT

We collect information related to our Services and Interactions directly from users, automatically related to their use of the Services and our Interactions, as well as from third parties. We may combine the information we collect from these various sources.

A. Information You Provide to Us. We collect information directly from users:

- Account registration, management, profile creation and modification
- Account access and use, as well as uploading content to the Services and other associated activities
- Electric Kick Scooter and Bicycle use
- Access to and use of the Sites and Apps
- Submission of payment information
- Event registration and attendance
- Participation in surveys, contests, sweepstakes and promotions sponsored by IOT Solutions/”gu-yoyo”
- Signing up to receive alerts or other information via email, text or instant messages from IOT Solutions/”gu-yoyo”
- Customer service, technical support, and related communications

- Participation in communities, commenting on blog entries, interacting with use on social media, and participation in other forums
- Submission of an application or resume to work at IOT Solutions/"gu-yoyo"

The types of information we collect directly from you are: your name, e-mail address, phone number, postal address, other contact information, credit card and billing details, including billing address, communications preferences, payment and transaction history, where required your birthdate and driver's license information or other identification card, and any other information you submit to the Services or otherwise provide to us. We also collect certain demographic data if you provide it to us including age, gender, preferred language, and current location.

B. Automatically Collected Information. We also collect information through automated and technical means as you browse our Sites, use our Apps, or otherwise use the Services:

- **Device and Online Usage.** We collect information about your computer, browser, mobile or other device that you use to access the Services. We may use cookies, pixels, log files and other similar technologies to collect such information, including IP address, device identifiers and other unique identifiers, browser type, browser language, operating system name, and version, device name and model, version, referring and exit pages, dates and times you access our Services, the length of time that you are logged into or using our Services, the links you click or features you use, software crash reports and session identification number. Please see the "Use of Cookies and Other Online Tracking Technologies" section below or our Cookie Notice for more information.
- **Location Info and Electric Kick Scooter and Bicycle Usage.** We automatically collect and store location information from your device and from any Electric Kick Scooters or Bicycles you use. We collect and store the location information (e.g., city, state or zip code where available) associated with the IP address of the device you use to access the Services, as well as, with your permission, your mobile device's location information using GPS or Bluetooth (you can change your location/Bluetooth settings for your mobile device; however, certain features may not be available through the App if you do so).
- **Analytics:** We compile and analyze information derived from the use of our Services, such as aggregate usage patterns, user preferences, peak demand times, common routes and other information.

C. Information We Collect from Third Party Sources. In some cases, we collect user information from third parties.

- **Third Party Platforms and Social Media Sites.** When you interact with us or post content about us on third-party social media platforms – like Facebook, Twitter, Google+, Tumblr, LinkedIn, YouTube or Pinterest – we may collect certain information about that interaction; the information that we may collect is based on your settings on and the policies of these social media platforms. We may also allow you to post certain information from these platforms to your IOT Solutions/"gu-yoyo" profile, and permit you to login to the Services using your third-party social media account, in which case you will be asked to consent to our access and collection of certain information from your social media profile, subject to the policies of that platform.
- **Other Third-Party Sources.** We also may collect information about you that we may receive from business partners, marketers, analysts and other sources to, enable us to verify and update

information contained in our records and better customize the Services for you. We may also collect information from credit reporting agencies to determine your creditworthiness, credit score and credit usage, in compliance with and to the extent permitted by applicable laws.

- **Referrals.** We may from time to time conduct a referral service so that you may introduce people you know to our Services, in accordance with applicable local laws. If you choose to use our referral service to tell someone about our Services, we will provide you with a template message and referral code to send to your friend. We will not collect the referral's information unless he/she signs up to use the Services with the referral code.

2) USE AND PROCESSING OF INFORMATION

We generally use the information we collect from and about you to provide and operate the Services, respond to user requests, for customer service and support, to protect our rights and those of others, to send marketing communications, to help us personalize user experiences and to improve the Services.

3) DISCLOSURE OF YOUR INFORMATION

We disclose the information we collect, in the following ways:

- a) **Affiliates and Subsidiaries.** Amongst our affiliated and subsidiary companies in furtherance of the purposes set out in this Policy; their use of your information is subject to this Privacy Policy.
- b) **Business Partners and Third Parties.** We may share your information with business partners who jointly sponsor events with us, from time to time; where required by applicable law, we will obtain your prior consent. You may at any time withdraw your consent or tell us to stop sharing your personal information (as defined under applicable law) with business partners and third parties by following the opt-out process described in the "Your Choices" section below. If you use the Services through a third-party platform that manages its own fleet of IOT Solutions/"gu-yoyo" Electric Kick Scooter or Bicycle, we will also share your information with the platform operator to assist in operating the Services.
- c) **Third-Party Service Providers.** We use a variety of third-party service providers that perform functions on our behalf, such as hosting, billing and payment processing, push notifications, storage, bandwidth, content management tools, analytics, customer service, fraud protection, etc.
- d) **General Business Operations.** Where necessary to the administration of our general business, accounting, record keeping and legal functions, to our tax advisors, legal counsel and other professional services entities or agents.
- e) **Legal Compliance and Protection of Rights.** We may also use or disclose information if required to do so by law or in the good-faith belief that such action is necessary to (a) conform to applicable law or comply with legal process served on us or the Services; (b) establish, protect and defend our rights or property, the Services or our users, including to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms of Use, Rental Agreement, other agreements or policies, or as evidence in litigation in which we are involved; and (c) act under emergency circumstances to protect the personal safety of us, our affiliates, agents, or users of the Services or the public. This includes exchanging information with other companies and organizations for fraud protection.

- f) **Other Users.** Certain features of our Services make it possible for you to share comments publicly with other users. Any information that you submit through such features is not confidential and may be accessed by others. For example, if you submit a product review on one of our Sites, we may display your review (along with the name provided, if any) on other IOT Solutions/"gu-yoyo" Sites and on third-party websites. Moreover, if you provide a comment on our blog, other blog readers will be able to review your comments, and if you interact with us on our social media pages, your comments will be publicly available. So, please take care when using these features. If you'd like to request removal of information that we have posted about you, please contact us as set forth in the "Your Choices" section below.
- g) **Aggregate/Anonymous Information.** We may share aggregate/anonymous information about use of the Services with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual, such as by publishing a report on usage trends. The sharing of such data is unrestricted.
- h) **Business Transfers.** As we continue to develop our business, we may seek to buy, merge, or partner with other companies. In such transactions, (including in contemplation of such transactions) user information may be among the transferred assets. If a portion or all of our assets are sold or transferred to a third party, customer information would likely be one of the transferred business assets. If such transfer is subject to additional mandatory restrictions under applicable laws, we will comply with such restrictions.

To request more information about the companies to whom we have disclosed your information, please contact us as set out in the "Contact Information" section.

4) USE OF COOKIES AND OTHER ONLINE TRACKING TECHNOLOGIES

Like most Sites and Apps and online Services, we use "cookies," web beacons (a/k/a pixel tags), analytics devices and similar technologies (some of which are operated by third parties) to record your preferences, gather information about the use of our Services, personalize content and ads and track information about the performance of our advertisements. We may also use these technologies to monitor traffic and make the Services easier and/or more relevant for your use. We may combine this information with other information we collect from you.

- a) **Cookies.** These are alphanumeric identifiers that we transfer to your device's hard drive through your web browser for record-keeping purposes and associate with small text files that we use to record certain information regarding your use of our online Services, your preferences and actions, and other device and usage data as described above. Some cookies allow us to make it easier for you to navigate our Sites, Apps, and Services, while others are used to enable a faster log-in process, personalize your use of the Services, or otherwise allow us to track your activities while using our Services. Many web browsers automatically accept cookies, but you can usually modify your browser's setting to decline or block cookies if you prefer. If you delete your cookies or if you set your browser or device to decline or block these technologies, some features of the Services may not work or may not work as designed.
- b) **Pixel tags (a/k/a web beacons or clear GIFs).** Pixel tags are tiny graphics with a unique identifier, similar in function to cookies, which are embedded invisibly on web pages or within emails. We or our service providers may use pixel tags in connection with our Services to, among other things, track the activities of users of the Site and App, help manage content, measure ad performance

and compile statistics about usage. We or our service providers also use pixel tags in HTML emails to our customers to help us track email response rates, identify when our emails are viewed, and track whether our emails are forwarded.

- c) **Analytics Services.** We use third-party analytics services, including Google Analytics, a web analytics service provided by Google, Inc. (“Google”), on our Services. Google Analytics uses cookies and other tracking technologies to help us analyze how users interact with and use the Services, compile reports on user’s’ activity, and provide other services related to activity and usage. The technologies used by Google may collect information such as your IP address, time of visit, whether you are a return visitor, and any referring website or app. To learn more about Google’s analytics services and to learn how to opt out of tracking of analytics by Google click [here](#).

5) ONLINE ADVERTISING

In order to display more relevant advertising on our Services, to manage our advertising on third-party sites, mobile apps and online services, and to measure and improve our ads and marketing efforts, we may work with Facebook, Google, Instagram, Twitter, TikTok and other third-party ad companies, ad exchanges, channel partners, measurement services, social media websites and ad networks. Please see the “Use of Cookies and Other Online Tracking Technologies” section below or our Cookie Notice for more information.

These third parties may use cookies, web beacons or other tracking technologies to collect information about your use of the Services and your activities across other websites and online services, which they may associate with persistent identifiers. This information may be used to provide you with more relevant advertising or other targeted content on our Services and other websites or services, and to measure the performance of such advertising. Their activities and your choices regarding their use of your information to personalize ads to you are subject to and set out in their own policies.

6) HOW WE PROTECT YOUR INFORMATION

We take technical, physical and organizational security measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, unauthorized disclosure or access. However, no method of transmission over the Internet, and no means of electronic or physical storage, is absolutely secure. We encourage you to take steps to protect your information and prevent unauthorized access to your password or account by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords, or for any activity on your account via unauthorized password activity.

7) RETENTION OF YOUR INFORMATION

We retain your information for as long as required to satisfy the purpose for which it is collected and used (for example, for the time necessary for us to provide you with customer service, answer queries or resolve technical problems), unless a longer period is necessary for our legal obligations or to establish, protect, or defend legal claims.

8) THIRD PARTY LINKS AND SERVICES

The Services contain links to third-party websites such as social media sites, and also contain third-party plug-ins and functionalities (such as the Facebook “like” button and Twitter “follow” button). If you choose to use these sites or features, you may disclose your information not just to those third parties, but also to their users and the public more generally depending on how their services function. We are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third-party websites or services, and not this Privacy Policy. We urge you to read the privacy and security policies of these third parties.

9) CHANGES TO THIS PRIVACY POLICY

We reserve the right to amend this Privacy Policy at any time to reflect changes in the law, our data collection and use practices, the features of our Services, or advances in technology. We will make the revised Privacy Policy accessible through the Services and updating the “Effective Date” for the Privacy Policy. If we make a material change to the Privacy Policy, you will be provided with appropriate notice in accordance with legal requirements. By continuing to use the Services, you are confirming that you have read and understood the latest version of this Privacy Policy.

10) YOUR CHOICES

If you would like to update your preferences on the types of communications you receive from us, or opt out of marketing communications from us, you may do so at any time by updating the communication preferences via email communications you receive from IOT Solutions/“gu-yoyo” by clicking unsubscribe. Please note that we may continue to send non-promotional communications such as important notices, payment confirmations and transaction-related emails and other information about your use of the Services.

11) CONTACT INFORMATION

If you have any questions about this Privacy Policy, would like to exercise your rights regarding your information that we hold, or would like to raise a complaint with us related to your information, you should contact us as follows:

Privacy Team
support@gu-yoyo.com

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