

PRIVACY POLICY

EFFECTIVE ON: MARCH 31, 2020

At 7th Sense, we want you to know that we value your personal information and that we respect your privacy. Please read our Privacy Policy for more information.

1.0 DEFINITIONS

- A. “You” and “your” mean the individual or entity visiting or using the Site.
- B. “7th Sense”, “we,” “us” and “our” means 7th Sense, LLC.
- C. “Site” refers to 7th Sense’s website at www.7thsr.com, and other related websites, blogs, domains, and mobile sites maintained by 7th Sense.
- D. “Non-Personal Information” is any information that is not Personally Identifiable Information (defined below). Non-Personal Information includes, without limitation, Personally Identifiable Information that has been anonymized.
- E. “Personally Identifiable Information” or “PII” is non-public information we receive from your use of the Site that can be used, alone or in combination with other information in our possession, to identify a particular person/individual. It may include information such as name, address, telephone number and other personal information you provide us.
- F. “Data” includes both Non-Personal Information and Personally Identifiable Information.

2.0 INFORMATION COLLECTED AND CONSENT

You do not have to provide any Personally Identifiable Information to browse the publicly available pages of the Site; however, in order to obtain or use products or services that are or may be provided through the Site or that we may otherwise offer online or offline (collectively, the “Services”) you may be required to register and/or provide Personally Identifiable Information.

We may collect PII from you in a variety of ways, including, but not limited to, when you visit the Site, communicate with us through the Site, provide PII in connection with other activities, products, services, features or resources we make available on the Site or through any services we may offer online or offline. We may collect your name, mailing address, billing address, phone number, payment information, or email address. We may also collect additional information from you depending on the nature of the transaction.

7th Sense also may collect information about you automatically when you visit the Site or use any of our online Services. We may automatically receive certain information from your browser or mobile device, such as your browser type, the operating system of your device, the URL of the site from which you came and the URL of the site you visit

when leaving the Site or any of our online Services. We may also receive your IP address and the name of your internet service provider (“ISP”) or your mobile carrier. Depending on your device’s settings, we may also receive location data and other types of information sent from third-party services or GPS-enabled devices. As you use the Site or any of our online Services, we may also collect information about such usage and your actions on the Site, such as pages you viewed, access times, and how long you spent on a page. We may use cookies to collect such information, as described in more detail below. This information is considered Non-Personal Information, which we can use for any purpose, including, without limitation, to help us improve the Site or the Services and to enhance your and other users’ experience. We may also convert PII into Non-Personal Information by excluding information that is personally identifiable. You acknowledge that Non-Personal Information and PII that is converted into Non-Personal Information belongs to 7th Sense and that 7th Sense has the right to use such general information as it determines in its sole discretion.

Notwithstanding the foregoing, we will treat as PII any item that, either alone or together with other information, we could use to identify an individual. Except as described below, we will not share with third parties the link between your IP address and your PII without your permission.

By providing your PII to us, you explicitly agree to our collection and use of such information as described in this Privacy Policy. By providing PII belonging to another person, you expressly represent and warrant that you have the authority and right to do so, and that you obtained all appropriate and required consents.

We may also collect your PII from sources that you have authorized to share with us. We will use your PII in those circumstances to provide the Services that your PII was shared with us to fulfill. If you believe we received your PII from a source without authority to share your PII with us, please contact us so that we can resolve your complaint.

7th Sense may use PII for the following purposes:

- A. *To improve customer service:* Your information helps us to more effectively communicate with inquiries and existing customers, and to respond to your customer service requests and support needs.
- B. *To personalize user experience:* We may use information in the aggregate to understand how our users as a group use the Services and resources provided on the Site.
- C. *To improve the Site:* We continually strive to improve our Site and the Services based on the information and feedback we receive from you.
- D. *To provide products or services and to process transactions:* Except as otherwise expressly provided in this Privacy Policy, we will use Data only for the purpose of fulfilling our duties and providing the Services. 7th Sense may use Non-Personal Information for product development, research, or other purposes. We may use the information that you provide about yourself or that you have provided to our clients for the purpose of providing and fulfilling the Services. We do not share this information with outside parties except to the extent necessary to provide the Services.
- E. *To send periodic emails:* The email address you provide for the Services will only be used to send you information and updates pertaining to the Services requested. It may also be used to respond to your inquiries, and/or other requests or questions.
- F. *To develop new products or services:* We use your PII and Non-Personal Information for research and commercial purposes. The information we collect may be used to develop new products or services. Except as otherwise provided in this Privacy Policy, we may use your PII and Non-Personal Information internally or, among other things, to offer our own or third-party products and services. Only 7th Sense, its subsidiaries, its suppliers and contractors involved in distributing the new product or service will have access to your PII. Our subsidiaries, suppliers and contractors will be required to use any PII we provide to them only for that intended purpose and subject to the terms of this Privacy Policy.

- G. *For marketing:* Except as otherwise expressly provided for in this Privacy Policy or except as prohibited by applicable law, 7th Sense may use your PII and Non-Personal Information to enhance its networking, marketing, social, and recruiting activities, and for other similar business purposes. We may also use Personally Identifiable Information to provide you information regarding new products or services. Personally Identifiable Information is not shared with entities outside of 7th Sense other than service providers who assist us in carrying out these business functions.
- H. *Compliance with applicable law:* We may disclose your PII as we may in our sole discretion determine is necessary or reasonably required to comply with the law, applicable regulations, court orders or subpoenas, to enforce our Terms of Use, or to protect our rights, property or safety, or the rights, property or safety of others.
- I. *Change in the Site Ownership:* If ownership of the Site or of 7th Sense changes, whether in whole or in part, information collected through the Site and the Services about you may be transferred to the new owner of the Site and/or 7th Sense, as the case may be, and any Services can continue. In that case, your user information would remain subject to the terms and conditions of the applicable version of the Privacy Policy.

3.0 WEB BROWSER COOKIES

The Site or our online Services may send a “cookie” to your computer. A cookie is a small piece of data sent to your browser from a web server and stored on your computer’s hard drive. A cookie cannot read data off your hard disk or read cookie files created by other sites. Cookies do not damage your system. Cookies allow us to recognize you as a user when you return to the Site or use the online Services using the same computer and web browser. We use cookies to identify which areas of the Site or online Services you have visited. We also may use this information to better personalize the content you see on the Site or online Services. 7th Sense does not store unencrypted Personally Identifiable Information in the cookies. We also do not link Non-Personal Information from cookies to your Personally Identifiable Information.

To help us optimize the Site or for marketing purposes, we may allow other authorized third parties to place or recognize unique cookies on your browser. Any information provided to third parties through cookies will be for enhancing your user experience by providing more relevant marketing. Third party services and tools we use, which may send cookies to users of the Site and may collect information from users, includes:

- **Adobe Creative Cloud (Typekit):** The Adobe Creative Cloud (Typekit) is operated by Adobe. The Adobe Creative Cloud (Typekit) collects anonymous data (ad views, analytics, browser information, cookie data, date/time, serving domains, interaction data and page views), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, EU- IP address, EU-unique device ID), sensitive (financial information). Aggregate and anonymous data is shared by Adobe with third parties. The Adobe Creative Cloud (Typekit) privacy policy can be found at:
<http://www.adobe.com/privacy/policies/typekit.html>
- **Google Analytics (also, referred to as “Google”):** Google collects anonymous data (ad views, analytics, browser information, cookie data, date/time, demographic data, hardware/software type, internet service provider, interaction data, page views, and serving domains), pseudonymous data (IP Address (EU PII), Device ID (EU PII), PII (name, address, phone number, email address, login, EU-IP address, EU-unique device ID), and sensitive data (financial information). Aggregate data, anonymous data, PII data and sensitive data are shared by Google with third-party parties. We use the information we get from Google only to improve the Site and for marketing purposes. Google collects only the IP address assigned to you on

the date you visit this website, rather than your name or other identifying information. You can review Google's privacy policy at: <https://www.google.com/policies/privacy/>. Although Google plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google about your visits to the Site is restricted by the Google Terms of Use and the Google Privacy Policy. You can prevent Google from recognizing you on return visits to the Site by disabling cookies on your browser (see below).

Some browsers may allow you to manage the storage of cookies on your device. If supported by your browser, you may set your browser to refuse all cookies (or, sometimes all third-party cookies) or to alert you when a cookie is placed. However, if you select these settings, you may be unable to access certain parts of the Site or the online Services. Unless you have adjusted your browser setting to refuse cookies, the Site and online Services will issue cookies. For more information about how to manage your cookies preferences, use the 'help' menu of your web browser or explore the customer support sections of your web browser. To opt-out of all cookies or certain advertising cookies, visit the company website for your browser for instructions.

Here are links to some browsers' websites:

- Google Chrome: www.google.com/chrome/
- Internet Explorer: support.microsoft.com
- Mozilla Firefox: support.mozilla.org
- Safari: support.apple.com
- Opera: www.opera.com

4.0 SECURITY

We will use commercially reasonable methods to keep personal information securely in our files and systems.

5.0 DO NOT TRACK

Your browser may provide you with the option to send a "Do Not Track" signal to websites you visit. This signal is used to request that websites not send the requesting device cookies, but websites have no obligation to respond to such signal or to modify their operation. At the current time, the Site is not programmed to recognize Do Not Track signals, so the Site will not treat you differently if we receive such signals from your browser and we may not comply with Do Not Track settings on your browser.

6.0 EXEMPTIONS FROM THE PRIVACY POLICY

Our Privacy Policy does not apply to any information you may send to 7th Sense by email or instant messaging programs (e.g., AOL, Yahoo, etc.), or through social media networks, even if you open such programs or services by clicking a link displayed on the Site. Email, social media, and instant messages are not recognized as secure communication forms. Please do not send any information you consider private to us by email or instant message or through social media sites (e.g., Twitter, Facebook, etc.) due to the public nature of such postings.

7.0 LINKS TO OTHER SITES

The Site and the online Services may contain links to other websites. 7th Sense is not responsible for the actions, practices, or content of websites linked to or from the Site or the online Services. You understand such websites may require you to agree to their terms of use and that we have no control over these terms. As always, you understand it is your responsibility to verify your legal use of a website, and use of information from the website with the corresponding website owner.

8.0 AGE OF CONSENT

7th Sense takes special care to protect the privacy needs of children under the age of 13 and we encourage parents to be an active participant in their child's online activities. 7th Sense abides by the Children's Online Privacy Protection Act (COPPA) and other relevant laws. The Site does not target and is not intended for children under the age of 13, and 7th Sense will not knowingly collect Personally Identifiable Information directly from them. If 7th Sense discovers that a child has provided personal data directly through the Site, 7th Sense will eliminate that data. This Site is only intended for persons 18 years of age or older. If you are under 18 you must ask a parent or legal guardian for permission prior to submitting any information to this Site.

If you have knowledge that a child 13 years of age or younger has submitted Personally Identifiable Information to us, please contact us and we will delete the PII information collected belonging to that child. You may contact us via email or by writing to us at the address below. Parents and guardians can also email us at privacy@7thsr.com, but before any information is disclosed, the parent will be required to provide verification of his/her identity and authority related to any request. We will only send the information to the parent email address in the registration file.

9.0 CAN-SPAM COMPLIANCE NOTICE

7th Sense fully complies with the federal CAN-SPAM Act. You can always opt out of receipt of further email correspondence from us.

10.0 CALIFORNIA PRIVACY RIGHTS

Under Section 1798.83 of the California Civil Code, residents of California can obtain certain information from companies with whom they have an established business relationship. That information is about the Personally Identifiable Information those companies have shared with third parties for direct marketing purposes during the preceding calendar year. The law requires companies to inform consumers about the categories of Personally Identifiable Information shared with third parties, the names and addresses of those third parties, and examples of the services or products marketed by those third parties. To request a copy of the information disclosure provided by 7th Sense under Section 1798.83 of the California Civil Code, please contact us via email to privacy@7thsr.com.

11.0 CALIFORNIA CONSUMER PRIVACY ACT

This Privacy Notice for California residents supplements the information contained above in our general privacy policy and applies solely to all visitors, users and others who reside in the State of California.

WE DO NOT SELL YOUR PERSONAL INFORMATION

Under the CCPA, a business that sells California residents' personal information to others: 1) must give notice to California residents before selling their personal information to others; and 2) must provide the right to opt out of the sale of their personal information.

7th Sense does not sell personal information of anyone under 16 years of age. 7th Sense does obtain personal information from its customers for a business purpose and does further collect personal information for the purpose of performing that business purpose for its customer. Although 7th Sense does not consider its activities to constitute the sale of PII, if you would like to opt out of our providing services to our customer that involve your PII, please contact us at the address at the bottom and inform us that you would like to opt out of our processing your personal information. Notwithstanding, 7th Sense contends that the notification and opt-out requirements do not apply to 7th Sense.

YOUR RIGHTS UNDER THE CCPA

Under the California Consumer Privacy Act ("CCPA"), California residents are granted the following rights:

- To know what personal information is being collected about them;
- To know whether their personal information is sold or disclosed and to whom;
- To say no to the sale of their personal information;
- To access their personal information;
- To have their personal information deleted; and
- To have the right to equal service and price, even if they exercise their privacy rights under this law.

When receiving a request, we will verify that the individual making the request is the resident to whom the personal information subject to the request pertains. California residents may exercise their rights themselves or may use an authorized agent to make requests to disclose certain information about the processing of their personal information or to delete personal information on their behalf. If you use an authorized agent to submit a request, we may require that you provide us additional information demonstrating that the agent is acting on your behalf. With respect to their personal information, California residents may exercise the rights described below:

Categories of Personal Information We Collect

We collect information that identified you, your household or your device or is reasonably capable of being connected with or linked to you, your household or your device. "Personal information" does not include public information available from government records, de-identified or aggregated information or information that is protected by certain laws such as HIPAA for health related information and the Gramm-Leach Bliley Act for certain financial institutions.

We collect, process and share some or all of the following categories of personal information:

- Identifiers
 - First and last name
 - Alias
 - Postal address

- Telephone number
- Cellular telephone number
- Gender
- Geographic area
- Title
- Internet protocol address
- State driver’s license number
- Age
- Race and ethnicity
- Commercial information
 - Transaction information
 - Products or services purchased, obtained or considered
 - Your purchasing or consuming history or tendencies
- Geolocation data
- Professional or employment related information
- Non-public education information
- Inferences drawn from this personal information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

Categories of Sources of Personal Information

We collect information from the following categories of sources:

- Directly from you. For example, information you provide us directly during a telephone call or survey.
- From third parties. For example, when we offer or promote services in conjunction with another company and they provide contact information to us. We may also receive information from a service provider when you apply for a job with us and we run a background check.

How We Share Your Personal Information

A third party to which we sell or disclose your personal information cannot sell your personal information unless you have received explicit notice and are provided an opportunity to exercise the right to opt-out.

We share information in each of the above categories as follows:

- We will share information in all of the above categories if our company is sold or we engage in a merger or other such transaction.
- We will share information in all of the above categories of information in connection with a law enforcement request that is compliant with the California Electronic Communications Privacy Act.
- Identifiers
 - We share identifiers with service providers who use that information only to provide services to us such as website development and operating, sending postal mail or email, analyzing website use, job applications, processing payments and processing data.
- We share commercial information with data analytics providers
- Geolocation Information.

- We share internet or other electronic network activity information with data analytics providers.

How We Use Your Information

See above for how we use your information. We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

How We Retain and Store Your Personal Information

We retain your personal information for as long as necessary to fulfill the purpose for which it was collected and to comply with applicable laws. We use reasonable security precautions to protect your information while in storage.

Requests to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the prior 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- The business or commercial purpose for collecting or selling your personal information.
- The categories of third parties with whom we share your personal information.
- The specific pieces of personal information we have collected about you
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - In the case of a sale, the categories of personal information sold about the consumer and the categories of third parties to whom the personal information was sold, by category of personal information for each category of third parties; and
 - In the case of disclosure for a business purpose, the categories of personal information that were sold or disclosed for a business purpose and if personal information has not been sold or disclosed for a business purpose, that we did not do so.

We are not required to (i) retain personal information about a consumer if collected for a single one-time transaction if, in the ordinary course of business, that information would not be retained and (2) re-identify or otherwise link any data that, in the ordinary course of business, is not maintained in a way that would be considered personal information.

Requests to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies, which we will disclose to you.

We are not required to grant your deletion request if retaining the personal information is necessary for us or our service providers to:

1. Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity; or prosecute those responsible for that activity.
3. Debug to identify and repair errors that impact existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act.
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest when the deletion of the public information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
7. For solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Internally make otherwise lawful uses of your personal information that are compatible with the context in which you provided the personal information.

How to Submit a Request to Know or a Request to Delete

To request this information, please submit a verifiable consumer request to us by either:

- Calling us at [toll free number] or
- Emailing us at privacy@7thsr.com and submit your request in the body of the email with the subject heading: "CCPA Consumer Request."
- Completing a CCPA Consumer Request Form through your 7th Sense account.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. We are not required to provide you with personal information more than twice in a 12-month period.

To make a request mail, email or call us at:

7th Sense
30600 Telegraph Road
Suite 1200
Bingham Farms, MI 48025

Or email us at:
privacy@7thsr.com

Or call us at:
(248) 203-9800 x304

We will not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will try to respond to your request within forty-five (45) days of receipt of your written request. If we require more time (up to 90 days), we will inform you of the extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, specifically by electronic mail communication.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

An amendment to the CCPA provides an exemption to the Right to Know and Right to Delete for personal information between a business and a person who is acting as an employee, director, officer, or contractor of a company, partnership, sole proprietorship, nonprofit, or government where the information is used in the context of a business transaction. This exemption is currently set to expire on January 1, 2021. Until that date, we will not respond to requests to know or delete that are within the scope of this exemption.

How to Submit an Opt-Out Request

To exercise the right to opt-out, you (or your authorized representative) may submit a request to us by contacting us at:

7th Sense
30600 Telegraph Road
Suite 1200
Bingham Farms, MI 48025

Or email us at:
privacy@7thsr.com

Or call us at:
(248) 203-9800 x304

Or clicking on the link titled "Do Not Sell My Personal Information".

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sharing with third parties. However, you may change your mind and opt back in to personal information sharing with third parties at any time by emailing us at privacy@7thsr.com.

We will only use personal information provided in an opt-out request to review and comply with the request. We will act upon your opt-out request within 15 days of receipt.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

12.0 YOUR NEVADA PRIVACY RIGHTS

Nevada law (SB 220), permits customers in Nevada to opt-out of the sale of certain kinds of personal information. A sale under Nevada law is the transfer of this personal information to third parties for monetary consideration so these third parties can then re-sell or license the sold information. We do not sell your personal information to third parties as defined in Nevada law. If you are a Nevada resident and wish to opt-out of the sale of your personal information should we change our practices in the future, you must send a request by email to privacy@7thsr.com.

13.0 AMENDMENTS

7th Sense reserves the right to change the Privacy Policy from time to time at its sole discretion with or without notice. Any revisions are effective immediately once posted on the Site. Your continued use of the Site shall indicate your acceptance of the revision. Revisions to the Privacy Policy regarding the use of Personally Identifiable Information are not retroactive.

14.0 EUROPEAN UNION DISCLOSURE

Personal information voluntarily submitted to 7th Sense online, via electronic communication, or otherwise, may be maintained or accessed in servers or files in the United States of America, which the European Union has not deemed to provide “adequate” privacy protection. If you do not consent to having your information processed and stored in the United States of America, please do not provide it to 7th Sense.

15.0 GENERAL DATA PROTECTION REGULATION

Under the General Data Protection Regulation (EU) 2016/679, EU residents have certain rights as to your PII. These rights include:

Right to Access

You have the right to request from 7th Sense copies of your PII. We may charge you a small fee for this service.

Right to Rectification

You have the right to request that 7th Sense correct any information you believe is inaccurate. You also have the right to request that 7th Sense complete information that you believe is incomplete.

Right to Erasure

You have the right to request that 7th Sense erase your personal data, under certain conditions.

Right to Restrict Processing

You have the right to request that 7th Sense restrict processing of your personal data, under certain conditions.

Right to Object to Processing

You have the right to object to 7th Sense processing of your personal data, under certain conditions.

Right to Data Portability

You have the right to request that 7th Sense transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights please contact us at:

7th Sense
30600 Telegraph Road
Suite 1200
Bingham Farms, MI 48025

Or email us at:
privacy@7thsr.com

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. The following is the contact information for the supervisory authorities in each member state: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm

16.0 CONTACT

If you have any questions about the Privacy Policy, or to report a violation of the Terms of Use, please contact us at privacy@7thsr.com or by mail at:

7th Sense
30600 Telegraph Road
Suite 1200
Bingham Farms, MI 48025

Or email us at:

privacy@7thsr.com

Or call us at:

(248) 203-9800 x304