

Last updated: May 25, 2018

## **We value privacy, especially yours**

At Asurion, we take protecting your privacy seriously. In order for our products and services to function properly, we need to collect and use certain Personal Information and Technical Data (collectively Information). We want you to understand what Information we collect and how it is used. This Privacy Policy explains Asurion's privacy practices related to your use of our mobile applications. As used in this Policy, Asurion includes Asurion LLC and its subsidiaries and affiliates.

This Policy is incorporated as part of the terms of any agreement that you have with Asurion that applies to your use of our mobile applications.

If you do not agree to the terms of this policy, please do not download or use any mobile applications or provide any personal information.

If you fail to provide certain information when requested, we may not be able to provide the services for which you have contracted.

## **Why we collect your personal information and the purpose of processing**

Personal Information we collect when you use our products and services is needed for the following purposes:

**Contract:** to process subscriptions, communicate with you, bill and collect, process cancellations and refunds, claims processing, provide customer service and internal quality assurance review of customer service, deliver the functionality in the mobile applications (e.g. click to call) and supply chain management.

**Legitimate interests:** for maintaining our books and records, maintaining security and integrity, monitoring use and performance, quality assurance, fraud detection and prevention, and product improvement and development.

**Comply with legal requirements:** to notify you as required by law in the event of a breach regarding the security of your personal data. We also use your Information to comply with EU and other legal requirements.

## **Where to turn with questions**

Please contact our Data Protection Officer by postal mail or email anytime with any questions or complaints at the following:

Asurion  
Attn: Data Protection Officer

c/o Office of the General Counsel  
648 Grassmere Park  
Nashville, TN USA 37211

[privacy@asurion.com](mailto:privacy@asurion.com)

Additionally, if you are located in the U.S. and have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

### **What's covered by this Policy**

Any application which links to this Policy, is covered by this Policy.

This Policy does not cover and we are not responsible for third-party websites or applications that may be linked from our applications; linking to them does not imply an endorsement. We are not responsible for these websites or applications or any information they may collect. You should always review the privacy policy of any third-party website or application.

### **Information we collect**

When you download and use our applications, we may collect the below types of Information.

#### **Personal Information:**

- Name;
- Mailing address;
- Email address;
- Cell phone number;
- Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data;
- Device serial number and media access control ("MAC") address;
- Information collected after obtaining your permission during your use of the application, such as geolocation information;
- Copies of information that you choose to backup from your phone;
- Other information that personally identifies you or is linked or linkable to you.

#### **Technical Data:**

This Technical Data may include:

- Telephony data, i.e. your network type, network operator name, subscriber identity module ("SIM") operator name, SIM country;
- Carrier name;
- Operating system version;
- Device model;
- Performance and data usage, i.e. data storage amount, Central Processing Unit ("CPU") and memory consumption;
- Other usage logs;
- Battery status and battery usage patterns and power consumptions
- Lists of other installed applications;
- Listing of types (i.e. Gmail, Yahoo, etc.) of other email accounts configured to your device;
- Device information related to your choice of settings for your device such as Wi-Fi, Global Positioning System ("GPS") settings, and Bluetooth settings;
- Mobile device settings;
- Screen brightness and roaming data;
- Other technical information Asurion may need to provide you with services;
- Aggregated, anonymous non-public Personal Information.

### **Mobile Analytics:**

We use mobile analytics software to allow us to better understand the functionality of our application on your phone. This software may record information such as:

- How often you use the application;
- The events that occur within the application;
- Aggregated usage; performance data; and
- The location from which the application was downloaded.

Asurion may leverage external data sources in order to provide context and background on the users of its services in order to improve customer experience, mitigate fraud or malicious activity, or comply with internal company and external regulatory requirements.

## **How we use your Information**

Asurion may use your Information to:

- Fulfill a Service to you;
- Complete your purchase;
- Establish and verify your identity;
- Activate and maintain and your account;
- Handle and resolve billing disputes;
- Monitor and maintain the performance and functionality of the device consistent with your choices;
- Provide technical support and click-to-chat functionality;
- Provide you with geolocation based services such as finding the nearest store;
- Protect and improve our services;
- Offer updates, notices and other information about applications and services available from Asurion or its affiliates as permitted by law;
- Respond to your questions, inquiries, comments and instructions;
- To enforce the applicable Terms of Service;
- Comply with the law and defend our rights;
- Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
- Protect against fraud and potential fraud;
- Notify you of any known breach of your Information; and
- Maintain the security and integrity of the application, and Asurion's systems and services.

In order to provide remote support and screen sharing capabilities, some devices require device administration access. This access will only occur with your permission, and will be disabled when the remote session ends.

## **How we share your Information**

We will not use or disclose your Information to non-affiliated third parties except as disclosed in this Policy.

Asurion may transfer your Information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this Policy and only use such information only for the purposes for which it was provided to them;
- A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer,

conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this Policy, or our products and services, in the manner described in this Policy. In these circumstances, Information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your Information to law enforcement and service providers that are engaged by us for the purposes of:

- Complying with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- Defending our rights and/or property or the rights and property of others;
- Enforcing our Terms of Use and/or this Policy;
- Responding to claims that the content(s) of a communication violates the rights of another; and
- Detecting, preventing or otherwise addressing fraud, security, or technical issues.

### **Security of your Information**

We have implemented technical and organizational measures designed to provide appropriate levels of security for your personal data. Reasonable administrative, logical, and physical controls are in place to prevent your personal information from being accidentally lost, used, or accessed in unauthorized ways.

### **How long we keep your Information**

To determine the appropriate retention period for information before we securely destroy it, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of your information, the purposes for which we process your information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

## **How you are notified if the policy changes**

We may change this policy from time to time. If we do, we will post the updated policy with the last revised date. You acknowledge that your continued use of our services after we publish or send a notice about our changes to this policy means that the collection, use and sharing of your personal data is subject to the updated policy. You should periodically read the policy to understand our privacy practices.

## **Communicating with you electronically**

By downloading and using our applications, you acknowledge that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy) relating to your use of our applications.

## **Accuracy of personal information**

While we take various steps to ensure the accuracy and completeness of your Information, we rely upon you to provide accurate and complete Information when interacting with us.

## **Your rights in connection with your personal information**

Under certain circumstances, and as required by law you have the right to:

- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you.
- **Request correction** of any incomplete or inaccurate personal information that we hold about you.
- **Request erasure** of your personal information when there is no need for us continuing to process it or you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information to suspend the processing, for example if you want us to verify its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to exercise any of these rights, please contact the Data Protection Officer in writing per the 'Where to turn with questions' section of this Policy. Valid requests will be honored within 30 calendar days of request. This 30-day period may be extended for another 2 months for complex requests with notification of the reasons for the extension to you. Any such requests should be

submitted to the Data Protection Officer.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. In addition, there may be requests that we are unable to process because of other EU legal requirements. If a request is denied, we will notify you of the reason.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you are located in the EU, you have the right to lodge a complaint with an EU Supervisory Authority. However, if you have a complaint regarding the processing of your Information we request that you first contact the Asurion Data Protection Officer and we will reply on a timely basis.

### **Individuals under the age of 18**

Our product and services are not directed to, and we do not knowingly collect personal information from individuals under the age of 18.

### **Data Controller**

As it pertains to users of the mobile applications located in the EU, the controller of your personal information is Asurion Soluto Europe Limited with its registered offices at: Chiswick Place, 272 Gunnersbury Avenue, Chiswick, London, England, WA 5QB

Asurion Soluto Europe Limited is also authorised and regulated in the United Kingdom by the Financial Conduct Authority ("FCA") under FCA register number 10163748.

### **APEC Participation**

The Asurion privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found [here](#).