



SpotGenius

# **SpotGenius**

## **Privacy Policy**

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# SpotGenius Privacy Policy

## Introduction

Visint Inc. DBA SpotGenius, on behalf of itself and its affiliates (“SpotGenius”) respects your individual privacy. This Privacy Policy describes how we collect, use, and share personal data we obtain from users of our products and services, including the <https://www.spotgenius.com> website, and related websites, mobile software applications, and other offerings (collectively, the “Services”). This Privacy Policy applies when you use the Services or interact with SpotGenius. By choosing to use the Services or otherwise providing SpotGenius personal data, you agree to this Privacy Policy. SpotGenius encourages you to read this Privacy Policy in its entirety. If you do not agree to this Privacy Policy, please do not use the Services.

## Who we are and contact details

This is the website of:  
Visint Inc. DBA SpotGenius  
1910 S. Highland Ave. Suite 330  
Lombard, IL 60148, USA

You can contact us via email at [info@spotgenius.com](mailto:info@spotgenius.com).

## What personal data we collect

In general, we receive and collect all information you provide via the Services, including through website input fields (including advertisements), tracking technologies (e.g., cookies, cameras in parking facilities), phone, email (including email campaigns), web chat, or in other such ways. This includes personal data that can identify or relates to you, including but not limited the following:

- I. Contact information, such as your full name, email address, mailing address, telephone number;
- II. Information related to customer surveys, promotions, and/or offers (e.g., preferences, demographics, interests, etc.); and
- III. Information about the device you use to access the Services (e.g. IP address).
- IV. Your location, as determined by GPS or WiFi Network.
- V. Vehicle information (Type, Make, Model, Color, License Plate etc.)
- VI. Your parking lots permits such as special parking privileges, disabled parking etc.

We also may periodically obtain information about you from affiliated entities, partners and other independent third-party sources and will add it to our database of information. For example, we may receive information about your interaction with advertisements on third party websites, including updated postal addresses and demographic information.

## Cookies

Cookies are pieces of information or code that a website transfers to or accesses from your computer or device to store, and sometimes track, information about you. Cookies let websites remember you and your preferences, manage different features and content, store searches, and personalize content.

Our Site uses cookies (alone or combined) to create a unique device ID, and to distinguish you from other users. This helps us to improve your experience and improve our Site. We also use cookies to keep our Site secure and to understand how users navigate around the Site. Some cookies only last while you use our Site. Some cookies are used to remember you when you visit again, and will last for longer. We use strictly necessary cookies if it is in our legitimate interests to do so (balanced with your rights). These are cookies where the storage of (or access to) information is essential rather than reasonably necessary. For instance, we need to use these cookies in order to provide a service to you. Additionally, these cookies can be strictly necessary in order to comply with a legal obligation that we are subject to. We use all other cookies with your consent. You can choose which cookies to consent to through Cookies Settings. Please see our Cookies Policy for more information about our use of these technologies on the Services.

## Transfers of Personal Data

SoptGenius and its servers are based in the US. SpotGenius makes no claim that its Services are appropriate or lawful for use or access outside the United States. If you access the Services from outside the United States, you are consenting to the transfer of your personal data from your location to the United States. By using our Services, you further consent to the storage of your information within the United States. You are solely responsible for complying with all local laws, rules and regulations regarding online conduct and access to the Services. Where a transfer of personal data across borders is required, we will implement appropriate or suitable safeguards (such as EU Commission approved Standard Contractual Clauses) in compliance with applicable laws to protect that personal data. Please contact us using our details above should you require further information.

## Links to Other Services

The Services may contain links to enable you to visit other services or websites of interest easily. Once you have used these links to leave our Services, you should note that we do not have any control over those other services or sites; therefore, we cannot be responsible for the protection and privacy of any personal data which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to those other services and sites.

## What we do with the personal data we gather

We use the personal data we gather about you for the following purposes:

- I. to manage our relationship with you, including to provide, monitor and improve the use of the Services, understand your needs, track your use and preferences at dispensers and respond to your inquiries;
- II. for internal record keeping;
- III. for internal analysis;
- IV. to administer promotions (e.g., registration for webcasts, etc.) and offers for which you register;
- V. to send you marketing communications and for other marketing-related purposes, subject to the Marketing provisions below;
- VI. to improve the products and services offered through the Services; and
- VII. to measure the number of visitors to the Services and the areas of the Services that are of most interest to visitors, and to customize the Services.

We do not use the personal data that you provide or obtained through the Services to make automated decisions about you. You always have the right to withdraw your consent at any time by contacting us using the details below.

To the extent permitted by applicable law, including laws outside your country of residence, SpotGenius may also use your personal data as we believe to be necessary or appropriate:

- I. to comply with applicable law or legal process;
- II. to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- III. to enforce our terms and conditions;
- IV. to protect our operations or those of any of our affiliates;
- V. to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- VI. to allow us to pursue available remedies or limit the damages that we may sustain.

We do not intend to collect any sensitive personal data (which is defined under EU law to include, for example, personal data on ethnicity, racial origin and health) through the Services.

## Marketing

Where required by local law, we will obtain your prior consent:

- I. in order to send you marketing communications about SpotGenius;
- II. in order to provide your personal data to SpotGenius affiliates for their marketing purposes; and
- III. in order to provide your personal data to third parties and other partners for joint marketing efforts or their own marketing efforts.

Please note that you always have the right to object or withdraw your consent. Otherwise we may contact you by email, phone, fax, mail, or other means unless you direct us not to do so. We may use your personal data for our own marketing purposes, including, but not limited to notifying you of new services, offers or other information via mail, email, telephone, text message, and other means.

If you do not want us to use your personal data for marketing purposes or to provide your personal data to SpotGenius affiliates or to third parties for their marketing purposes, you may opt-out of such uses by notifying us in accordance with the procedure set forth below under the heading, “Rights to your Personal Data.”

## Data Sharing

We may share your personal data with our affiliates, partners, contractors, agents, and third party service providers (including contractors who provide services to us) to provide the Services or assist with any of the uses of personal data described above. SpotGenius limits such third parties’ use of personal data to be consistent with this Privacy Policy and other appropriate confidentiality and security measures, and prohibits such third parties from sharing or using the personal data for any other purpose.

We may also disclose your personal data to third parties if disclosure is required to comply with applicable laws or regulations; comply with a legal obligation, process or court order; to respond to requests from public and government authorities; or if disclosure is necessary to enforce our Privacy Policy and/or Terms of Service; to protect your safety or security; to protect our rights, the safety and security of our site and property or that of SpotGenius Affiliates or third parties; or to allow us to pursue available remedies or limit the damages we may sustain.

We may share or transfer your personal data to a third party if SpotGenius enters into, or is involved in, a transaction such as a merger, acquisition, reorganization, or sale of some or all of its assets.

## Personal Information You Post in Public Areas

When you post a message in a SpotGenius forum, or chat room, or provide a review or customer feedback to SpotGenius, the information you post may be accessible to other users of the Services and the public. If you post personal data anywhere on the Services that is accessible to other users or the public, you are advised that such personal data can be read, collected, used, or disseminated by others and could be used to send you unsolicited information or for other purposes. Accordingly, you assume full responsibility for posting such data and agree that SpotGenius is not responsible in any way for personal data you choose to post in such public areas.

## De-Identified and Aggregated Information

SpotGenius may publish, share, distribute, or disclose personal data that has been aggregated with information from other users or otherwise de-identified in a manner that does not allow such data about you to be separated from the aggregate data and identified as originating from you, to third parties, including SpotGenius partners, sponsors, and advertisers. Such information may help SpotGenius identify and analyze demographic and psychographic trends and information, and report to third parties how many people visited certain parking facilities, clicked

on certain content on the website, accessed the Services through the website or app, viewed ads, or other materials.

## How Long Will We Hold Your Personal Data

We will retain your personal data for as long as:

- I. we have a relationship with you;
- II. we are required by law; or
- III. we need to in order to protect ourselves as a business or protect any other third party.

SpotGenius may further retain your data for a commercially reasonable time thereafter for backup, archival, fraud prevention, or detection or audit purposes. SpotGenius complies with applicable data protection laws, including applicable security breach notification requirements. If you have any questions about our retention policy, please contact us using the details set out above.

## Rights to your personal data

Under certain laws, you have the right to seek access to your personal data, seek rectification or erasure of your personal data, restrict our use of your personal data, object to our use or request data portability. Please contact us if you wish to exercise any of these rights.

In any event, you can always ask us for more information about our disclosure of and the people who will be able to see and access your personal data.

In accordance with applicable laws, you may choose to restrict the collection or use of your personal data by us by emailing us at [info@spotgenius.com](mailto:info@spotgenius.com). You may also write to us at the above address (located at the beginning of this Privacy Policy), or use the “Contact” tab on our home page. This includes where you:

- I. have previously not objected to us using your personal data for our direct marketing purposes, but now wish to opt-out of receiving future marketing emails from us;
- II. want to opt-out of any new uses of personal data permitted by this Privacy Policy caused by changes in our information practices;
- III. do not want us to share your personal data with third parties for marketing purposes;
- IV. believe that personal data we are holding on you is incorrect or incomplete so that we can consider your concern; or
- V. do not want to be contacted by us in the future (unless you initiate the contact).

Any such requests are subject to the protection of other individuals’ rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the data. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal data that we maintain.

# Additional Information

## Persons Under 18

The Services are not directed to children and we do not knowingly collect or allow the collection of personal data from persons under the age of 18. Please do not use the Services or provide any personal information to SpotGenius if you are under the age of 18 or if you are not old enough to consent to the processing of your personal data in your country. If you are the parent or guardian of a person under the age of 18 and believe that the person has provided personal data to us, please contact us at [info@spotgenius.com](mailto:info@spotgenius.com).

## Your California Privacy Rights

California Civil Code Section 1798.83 permits our customers who are California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please e-mail us or write to us at the addresses above.

## Updates to This Privacy Policy

We may update this Privacy Policy by posting a new version on our website. If we update this Privacy Policy in a way that significantly changes how we use your personal data, we will bring these changes to your attention where reasonably possible. Otherwise, we recommend that you periodically review this Privacy Policy to be aware of any other revisions.

You have the right to complain about our use of your personal data. Please contact us using the contact details set out above. Depending on where you are located, you may also have a right to complain to your local data protection regulator.