
Nightingale's Privacy Policy

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Contents

- 1. Introduction3
- 2. Meaning of Personal Information3
- 3. Other privacy terms may apply3
- 4. The kinds of Personal Information we collect and hold and what we use it for.....3
 - 4.1 Contact details3
 - 4.2 Drone Video Content4
 - 4.3 Drone flight data4
 - 4.4 Shareholder4
- 5. Working with us5
- 6. Persistent identifiers and tracking5
- 7. How Personal Information is collected.....6
 - 7.1 Direct collection of Personal Information6
 - 7.2 Indirect collection of Personal Information.....6
- 8. Website collection.....6
- 9. How Personal Information is held6
- 10. Why we collect, hold, use and disclose Personal Information7
- 11. Overseas sharing of Personal Information8
- 12. Children’s privacy8
- 13. California privacy rights8
- 14. Links to External Websites8
- 15. Privacy Policy updates8
- 16. How can you access or seek correction of your Personal Information?.....9
- 17. Complaints.....9
- 18. Contact details9

1. Introduction

- 1.1 Thank you for reviewing Nightingale Security's (referred to as "**Nightingale**", "**we**," "**us**" or "**our**") Privacy Policy (the "**Privacy Policy**") for our robot as a service system, including our drones and applications (collectively, referred to as the "**Service**"). References to "**you**" and "**your**" in this Privacy Policy refers to any individual about whom we collect personally identifiable information (referred to as "**Personal Information**").
- 1.2 This Privacy Policy details Nightingale's handling of Personal Information about users of our Service.
- 1.3 Our Privacy Policy also describes generally how we manage the Personal Information we deal with in the course of our business and demonstrates our commitment to the protection of your privacy.
- 1.4 This Privacy Policy applies to all Personal Information collected by us, or submitted to us, whether offline or online, including Personal Information collected or submitted through our website <https://www.nightingalesecurity.com> (our "**Website**") and any mobile sites, applications, widgets and other mobile interactive features (collectively, our "**Apps**"), through our official social media pages that we control (our "**Social Media Pages**") as well as through HTML-formatted email messages that we send to you (collectively, including the Social Media Pages, Apps and Website, the "**Sites**").

2. Meaning of Personal Information

In this Privacy Policy, "**Personal Information**" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- 2.1.1 whether the information or opinion is true or not; and
- 2.1.2 whether the information or opinion is recorded in material form or not.

3. Other privacy terms may apply

Other terms may also apply to you and the Personal Information we hold about you. For example, sometimes, we may also provide you with additional information or terms which apply to you (for example, we may provide you with a 'collection statement' or an agreement which contains privacy terms and conditions).

4. The kinds of Personal Information we collect and hold and what we use it for

The kinds of Personal Information we collect and hold and what we use it for depends on your dealings with us, but may include the following:

4.1 Contact details

- 4.1.1 We will collect your contact details including, your name and email address so that you can download our Apps to access and use our Service. We will email you and provide you with a download link and a login username. You will be required to set up a password to login to the Apps to access and use the Service.

- 4.1.2 If you contact us with questions or request information or support, we will collect your contact details that you voluntarily provide to us such as your name, email address and any other Personal Information (for example, your postal address or mobile number in your email signature) you include in your question or request for information or support.
- 4.1.3 We may use your Personal Information to provide you with our Service and customer support, contact you to deliver certain information you have requested, verify your authority to use the Service, improve the content of the Service and for General Administration (as defined below) purposes.
- 4.1.4 **“General Administration”** may include:
- (a) administering billing and payments and debt recovery;
 - (b) planning, managing, monitoring and evaluating our Service;
 - (c) quality improvement activities, statistical analysis and reporting;
 - (d) training staff, contractors and other workers;
 - (e) risk management and the management of legal liabilities and claims;
 - (f) responding to enquiries and complaints regarding our products or Service;
 - (g) obtaining advice from consultants and other professional advisers; and
 - (h) responding to subpoenas and other legal orders and obligations.

4.2 **Drone Video Content**

We will collect video content obtained through the drone’s video surveillance and such content may include the still and moving images of individuals (including faces), including you or the personnel of your company, including employees, officers, agents and other third parties in such videos (**“Video Content”**). We will use this Video Content to provide the Service to you and your company and to monitor and improve the Service.

4.3 **Drone flight data**

We also collect flight log data from the Service, including data regarding telemetry, speed, weather, terrain, topographical maps and any generated data made therefrom through the drone’s Video Content. Generally speaking, this data is not Personal Information.

4.4 **Shareholder**

- 4.4.1 We (or a share registry provider we may engage) may also collect Personal Information to maintain shareholder information in accordance with the relevant securities exchange’s (for example, the Australian Securities Exchange’s) or other regulators’ requirements, such as:
- (a) the name of the individual shareholder and any trustee (if applicable);
 - (b) personal details relating to any power of attorney (e.g. the attorney’s name, address, occupation, date of birth and phone number);
 - (c) bank account details; and
 - (d) your securityholder reference number or holder identification number.

- 4.4.2 When we collect Personal Information from shareholders, we may also use and disclose it for other reasons related to your shareholding, such as identity verification, providing shareholder services, sending you correspondence and documents and responding to complaints or inquiries. We may also use your Personal Information to market our products and services (including the Service), such as exclusive shareholder offers, to you.

5. Working with us

- 5.1 We collect Personal Information when recruiting personnel. This includes your name, contact details, qualifications and work history. Generally, we will collect this information directly from you or parties you have nominated such as recruitment agencies or referees. Before offering you a position, we may collect additional details such as your social security number or tax file number (if based in Australia), your bank details, defined benefits or contributions information or superannuation information (if based in Australia) and other information necessary to conduct background checks to determine your suitability for certain positions.
- 5.2 We may also collect publicly available information or information that third parties disclose to us in accordance with their privacy policies where relevant.
- 5.3 When you start working with us, we may also collect geolocation information which is provided when you submit information and data to us over our IT systems from devices which you use in the course of performing your duties.
- 5.4 In very rare circumstances, we also collect sensitive information about you when you provide this sensitive information to us on a voluntary basis and wish for us to collect and record this information in the course of working for us. This may include your health information, racial or ethnic origin, political opinions or memberships, religious or philosophical beliefs, sexual orientation or practices or other sensitive information specified in the applicable data protection or privacy laws (“**Sensitive Information**”) you provide to us as part of the diversity, inclusion and health programs, services and other initiatives we offer to our team.

6. Persistent identifiers and tracking

- 6.1 In our Sites, we may use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can read more about cookies at www.allaboutcookies.org.
- 6.2 We may use session cookies to make it easier for you to navigate the Service and to improve and track the overall Service experience. We may set a persistent cookie to store your general usage behaviour and IP addresses but not Personal Information. Persistent cookies enable us to track, store and target the interests of our users to enhance the experience on our Service. If you reject cookies, you may still use our Service, but your ability to use some areas of our Service may be limited.
- 6.3 We neither follow nor track signals from your browser and we do not currently track users over time and over our Website or Apps.
- 6.4 However, third party providers of external services like web traffic analysis services, such as Google Analytics, may track users over time and over our Service and third party websites and such third parties may also place cookies, via our Service.
- 6.5 You can read more about privacy and cookies set by Google Analytics at <https://www.google.com/policies/privacy/>

- 6.6 We may analyse this aggregate tracking data that we collect for trends and statistics in the aggregate, and we may use such aggregate information to administer the Service, and gather broad demographic information for aggregate use.

7. How Personal Information is collected

7.1 Direct collection of Personal Information

- 7.1.1 We generally collect your Personal Information directly from you. For example, we may collect Personal Information about you when you deal with us over the telephone, send us correspondence (whether by letter or email), when you have contact with us in person or when you visit our Website or otherwise complete a form on our Website. If we do not obtain the information requested, we may not be able to provide you with the products or services requested or fulfil another applicable purpose of collection.
- 7.1.2 We may also collect your Personal Information by recording calls which you make when using our Service. We record calls for security, safety, training and monitoring purposes.

7.2 Indirect collection of Personal Information

- 7.2.1 There may be occasions when we need to obtain Personal Information about you from a third party. For example, we may collect Personal Information from your employer. If you work for one of our service providers, contractors, advisors, business customers or other organisations with whom we do business, we may need to obtain your contact details from them. In some circumstances also, we may need to obtain information relating to you from a publicly maintained record.
- 7.2.2 If you provide Personal Information to us about someone else (such as one of your employees if you are one of our service providers, contractors, advisors, business customers or other organisations with whom we do business, or a member of your household or someone with whom you have dealings) you must be entitled to disclose that information to us and make sure that we are entitled to collect it. You should let the person know that they can access this Privacy Policy on our Website or by calling us using our contact details set out below. If the information you provide is Sensitive Information, then you will need to obtain the consent of the person to whom it relates before you provide it to us.

8. Website collection

When you visit our Website, we may collect additional information about your use of the Website, which may or may not identify you. For instance, we may collect information about which pages you visit on the Website to help us determine which parts of the Website you value, so that we can build and develop our Website to best meet our customer's needs. We may also collect information about your internet browser and operating system, the address of the referring site, your internet protocol address and clickstream information. This information helps us to understand how you came to find our Website. For more details see the section 6 above 'Persistent Identifiers and Tracking'.

9. How Personal Information is held

- 9.1 We store Personal Information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers). We take reasonable steps to protect your Personal Information from loss, unauthorised access,

disclosure, alteration or destruction and maintain physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security as set out below.

- 9.2 We and our hosting provider may employ procedural and technological measures that are generally consistent with industry practice such as password protection and encryption. Although it is impossible to guarantee the security of Personal Information at all times (due to third parties that may be able to penetrate the security systems in place), such measures are reasonably designed to help protect your Personal Information from loss, unauthorised access, disclosure, alteration or destruction. We use password protected double ended encryption with cryptography tools to secure all data.
- 9.3 Our computer systems and third party hosting provider systems are currently based in the United States so your Personal Information will be processed by us in the United States where data protection and privacy regulations may not offer the same level of protection as in other parts of the world, such as the European Union. In particular, you are advised that the United States of America uses a sectoral model of privacy protection that relies on a mix of legislation, governmental regulation, and self-regulation. By using the Service you consent and agree to this Privacy Policy and to the processing of that information in the United States of America as described in this Privacy Policy. Note that if your company is located in the European Union, we will host your Video Content data in the European Union and it will not be transferred to the United States.
- 9.4 We recommend that you create unique and strong passwords to login to the Apps and that you log off the Apps whenever you have completed a session in the Service.

10. Why we collect, hold, use and disclose Personal Information

- 10.1 We may use and disclose your Personal Information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.
- 10.2 We may disclose your Personal Information and the data generated by cookies and the aggregate information to the vendors and service providers, that we may engage to assist us in providing our Service to you, for their use solely to provide us with such assistance, such as our hosting providers.
- 10.3 On your request we will send your Video Content data to your video management system.
- 10.4 We will also disclose your Personal Information:
- 10.4.1 if we are required to do so by law, regulation or a government authority or otherwise in cooperation with an ongoing investigation of a governmental authority;
 - 10.4.2 to enforce our customer agreements or to protect our rights; or
 - 10.4.3 to protect the safety of our users of our Service or to protect our or any third party's safety or property.
- 10.5 We will not sell your Personal Information to any company or organisation, but we may transfer your Personal Information to a successor entity upon a merger, consolidation or other corporate re-organisation in which we participate or to a purchaser or acquirer of all or a portion of our assets to which this Service relates.

11. Overseas sharing of Personal Information

- 11.1 We are a global organisation and we work with customers, service providers and commercial parties across the globe. It is likely that your Personal Information will be disclosed to overseas recipients, including in the United States, the Middle East, Australia and Europe.
- 11.2 Unless we have your consent, or we are otherwise permitted under applicable data protection or privacy laws, we will only disclose your Personal Information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach applicable data protection or privacy laws in relation to your Personal Information.

12. Children's privacy

We recognise the privacy interests of children and we encourage parents and guardians to take an active role in their children's online activities and interests. The Service is not directed to children under the age of 13 ("**Minors**"). We neither target this Service to Minors nor do we knowingly collect Personal Information from Minors. If you are a Minor, please do not provide us with any of your Personal Information.

13. California privacy rights

We do not disclose any Personal Information to third parties for their direct marketing purposes. Should this practice change, we will seek your consent before disclosing information for a third party's direct marketing.

14. Links to External Websites

- 14.1 Our Sites may provide links to other websites or resources over which we do not have control ("**External Websites**"). Such links do not constitute an endorsement by us of those External Websites. You acknowledge and agree that we are providing these links to you only for convenience, and further acknowledge and agree that we are not responsible for the content of such External Websites. Your use of the External Websites is subject to the terms of use and privacy policies located on the links to External Websites.
- 14.2 If an External Website directly collects Personal Information about you, your use of the External Website is subject to the terms of use and privacy policy located on the link to the External Website.

15. Privacy Policy updates

- 15.1 We may need to update this Privacy Policy from time to time.
- 15.2 If so, we may send registered users an email notifying them of this update. We may also post our updated Privacy Policy on our Service along with a notice that the Privacy Policy has been changed so that you are aware of the updated Privacy Policy. We encourage you to review this Privacy Policy regularly for any changes. Your continued use of this Service and/or your continued provision of Personal Information to us will be subject to the terms of the then-current Privacy Policy.

16. How can you access or seek correction of your Personal Information?

- 16.1 You are entitled to access your Personal Information held by us on request. To request access to your Personal Information please contact us using our contact details set out below.
- 16.2 We will take reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.
- 16.3 However, if you consider any Personal Information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.
- 16.4 We may decline your request to access or correct your Personal Information in certain circumstances in accordance with the applicable data protection or privacy laws. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your Personal Information about the requested correction.

17. Complaints

- 17.1 You may make a complaint about privacy to us using our contact details set out below. We will first consider your complaint or determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather facts, locate and review documents and speak with individuals involved. In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.
- 17.2 If you are not satisfied with our response to your complaint, or you consider that we may have breached applicable data protection or privacy laws, you have the right to contact or lodge a complaint with your local data protection authority or privacy regulator.
- 17.3 If you are based in Australia, the local privacy regulator is the Office of the Australian Information Commissioner, which can be contacted by telephone on 1300 363 992 or by using the contact details set out on the website www.oaic.gov.au.

18. Contact details

If you have any questions regarding this Privacy Policy, please contact us using the following contact information:

- Attention: Privacy Officer;
- Address: 8450 Central Ave, Newark, CA 94560, United States;
- Phone: For inquiries within USA call us at 408-909-7227 (RAAS), for inquiries within Europe, please call at +32 473 86 9797 or for inquiries within Australia please call us at + 61 468 918 655; and

- Email: privacy@nightingalesecurity.com.