

SIMPLY ENGAGING TECHNOLOGIES, LLC.

PRIVACY POLICY

Last modified: MAY 31, 2020

Simply Engaging Technologies, LLC. (the “**Company**” or “**We**”) respects your privacy, and we are committed to protecting it through reasonable efforts according to this privacy policy (the “**Policy**”). The Policy was created to demonstrate our commitment to transparency and fair information practices. This Policy describes the types of information we may collect or that you may provide when you visit, text, or access our website and other online or mobile-based services (collectively, the “**Platform**”) made available to you. This policy applies to all information we collect through the Platform, in e-mail, text, and other electronic communications sent through, or in connection with, any component of the Platform. This policy DOES NOT apply to information we collect offline or from any other third-party apps or websites you may access through the Platform or that you provide to, or is collected by, any third party. Third parties have their own privacy policies, which we encourage you to read before providing information on or through them.

IF YOU DO NOT AGREE WITH THE TERMS IN THIS PRIVACY POLICY, YOU MAY NOT USE THE PLATFORM.

Information We Collect

How we collect and store information depends on how you access and use the Platform. We collect information in multiple ways including when you provide information directly to us, when you permit third parties to provide information to us, and when we passively collect information from you, such as information collected from your browser or device.

1. **Information You Provide Directly to Us.** There are areas on our Platform where you can share information that is unique to you, such as your name, phone number, and any other information (“**Personal Information**”). Use of the Platform may require submission of some Personal Information. We ask for Personal Information in order to facilitate contact tracing and communications on the part of our customers.

2. **Information that is Passively or Automatically Collected.** When you access, or use the Platform, it may use technology to automatically collect information including, but not limited to:

A. Location Information. We may collect real-time information about the location of your device. We may ask you to grant us access to your device's geolocation data. If you grant such permission, We may collect information about your precise geolocation, and We may share your location information with our customers to optimize customer service. If you access the Platform through a mobile device and you do not want your device to provide us with location-tracking information, you can disable the GPS or other location-tracking functions on your device, provided your device allows you to do this. See your device manufacturer's instructions for further details. If you disable certain functions, you may be unable to use certain parts of the Platform.

If you do not want us to collect any of this information do not access any part of the Platform. Alternatively or additionally, you may email us at support@wirl.io to opt-out from collection of your information and to delete your information. Note, however, that opting out of collection of personal information will not allow you to use the platform

How We Collect Information

We may collect information directly from you through your input in the Platform

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Information, to:

Allow our customers to provide waitlist functionality

Allow healthcare workers to trace any medically required incidents

We use location information we collect to update information to help customers accurately determine proximity of guests.

We may also use your information to contact you about the Company's and third parties' goods and services that may be of interest to you. If You do not want us to use your information in this way, please do not use any part of the Platform, and e-mail us at support@wirl.io to opt out from collection of your information and to delete your account.

Disclosure of Your Information

We may disclose aggregated information about Our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose information that We collect or you provide, including Personal Information:

To the Company's subsidiaries and affiliates.

To contractors, service providers, and other third parties we use to support the Platform and who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which We disclose it to them.

To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information We hold about the Platform users is among the assets transferred.

To fulfill the purpose for which you provide it, or for which We reasonably understand you to have provided it.

For any other purpose disclosed by us when you provide the information. With your consent.

To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

To enforce the Company's rights arising from any contracts entered into between you and us and for billing and collection.

If We believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

5. As described in this Policy, We may sometimes share your information with affiliates or with third parties. When you use the Platform, you authorize us to transfer, store, and process your information in the United States and possibly other countries. Laws in states other than your home state and other countries may differ from the laws applicable to the place where you live. By using the Platform, you consent to transferring your data to these countries.

Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the Personal Information you provide to us. This section describes mechanisms We provide for you to control certain uses and disclosures of your information.

Location Information. You can choose whether to allow the Platform to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location

information, some parts of the Platform may then be inaccessible or not function properly.

Promotion by the Company. If you do not want your phone number used to promote products or services, you can opt out by sending an e-mail stating your request to support@wirl.io

Accessing and Correcting Your Personal Information

You can review and change your Personal Information by logging into your Account and visiting your account profile page. You may also send the Company an e-mail at support@wirl.io to request access to, correct, or delete any Personal Information that you have provided to Us. We may not accommodate a request to change information if We believe the change would violate any law or legal requirement or cause the information to be incorrect.

Your California Privacy Rights

California Civil Code Section 1798.83 permits users of the Platform who are California residents to request certain information regarding the disclosure of Personal Information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to support@wirl.io

Privacy of Children

We do not knowingly solicit or collect information from anyone under 13 years of age. The Site and Platform are not intended for use, and should not be used, by children under 13 years of age. If We learn that We have collected or received Personal Information from a child under 13 years of age, We will delete that information. If you believe that We may have any information from or about a child under 13, please contact us at support@wirl.io

Data Security

The safety and security of your information is important to us. We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide through the Platform is stored encrypted on the Company's secure servers behind firewalls and encrypted using SSL technology. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although We make our best reasonable effort to protect your Personal Information, We cannot guarantee the security of your Personal Information transmitted through the Platform. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

WE MAKE NO REPRESENTATIONS ABOUT THE SECURITY OF YOUR PERSONAL INFORMATION. YOU AGREE TO ASSUME ALL RISK IN AND SOLE RESPONSIBILITY FOR USING THE SITE INCLUDING, WITHOUT LIMITATION, ALL RISK OF INJURY DUE TO A DATA SECURITY BREACH.

Release

You hereby waive, release, and forever discharge Company, its current and former affiliates, subsidiaries, related companies, predecessors, directors, officers, members, attorneys, and agents, from any and all losses, damages, costs, actions, suits, complaints, and injuries to you, whether known or unknown, liquidated or unliquidated, absolute or contingent, that are directly or indirectly related to, caused by, or arise out of a data security breach. In addition, you agree to at all times hold harmless, indemnify, defend, and forever release and discharge Company from and against any and all claims, liabilities, actions, or causes of action threatened or asserted against Company or that could be asserted against Company arising out of or resulting from a data security breach, or any commenced or threatened action by a third party against Company arising out of or relating to a data security breach.

Changes to Our Privacy Policy

We reserve the right, at any time, to add to, change, update, or modify this Policy, and shall post any change, update, or modification on this page. If we make material changes to how We treat Personal Information, We will additionally notify you by e-mail to the primary e-mail address specified in your account, or as an alert in the App the first time you use the App after We make the change. The date the Privacy Policy was last revised is identified at the top of the page. You are responsible for ensuring that We have an up- to-date, active, and deliverable e-mail address for you and for periodically visiting this Policy to check for any changes. Updates and changes to the Policy will continue to govern your use of the Platform even if you elect not to receive notice of such changes.

Contact Information

To ask questions or comment about this Policy or our privacy practices, contact:

by Mail:

Simply Engaging Technologies, LLC.

7324 Emerson Ave S Richfield MN 55423 by email:

support@wirl.io 13783687v2