



PRIVACY POLICY

X2M Connect Limited

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Introduction

We take your privacy very seriously and are committed to ensuring the protection of your personal information. Each member of the X2M Connect group collects and handles your personal information in accordance with its legal obligations, including those under the Privacy Act 1988 (Cth).

X2M Connect Limited and its subsidiaries (the X2M Group) provide a wide range of utility based services, operates websites and conducts its own corporate operations (the Services).

This Statement describes how your personal information is collected and handled by the members of the X2M Group.

If you are located in the European Union or the United Kingdom, you should not use the Services as the X2M Group does not comply with the European Union or United Kingdom General Data Protection Regulations (GDPR).

This Privacy Policy provides our policies and procedures for collecting, using, and disclosing your information. Users may provide personal information through access to one of the Services through our website www.x2mconnect.com, applications on Devices, through APIs, through third-parties or directly through mail, email, fax or phone. A “Device” is any computer used to access the Services, including without limitation a desktop, laptop, mobile phone, tablet, or other consumer electronic device. This Privacy Policy governs your access of the Services, regardless of how you access them, and by using our Services you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy. All of the different forms of data, content, and information described below are collectively referred to as “information.”

1. The Information We Collect And Store

We may collect and store the following information when running the Services:

Information You Provide. We may collect some personal information, such as your name, phone number, email address and home and business postal addresses.



Files. We collect and store the files you upload, download, or access with the Services (“Files”).

Log Data. When you use the Services, we automatically record information from your Device, its software, and your activity using the Services. This may include the Device’s Internet Protocol (“IP”) address, browser type, the web page visited before you came to our website, information you search for on our website, locale preferences, identification numbers associated with your Devices, your mobile carrier, date and time stamps associated with transactions, system configuration information, metadata concerning your Files, and other interactions with the Services. When you use the Services, we may automatically collect certain data regarding your usage of utility resources.

2. How We Use Personal Information

Personal Information. In the course of using the Services, we may collect personal information that can be used to contact or identify you (“Personal Information”).

Personal Information is or may be used: (i) to provide and improve our Services, (ii) to administer your use of the Services, (iii) to better understand your needs and interests and (iv) to personalize and improve your experience. We will not use your Personal Information for purposes other than the Services.

Geo-Location Information. Some Devices allow applications to access real-time location-based information (for example, GPS). Our mobile apps do not collect such information from your mobile device at any time while you download or use our mobile apps as of the date this policy went into effect, but may do so in the future with your consent to improve our Services. Some photos and videos you place in the Services may contain recorded location information. We may use this information to optimize your experience.

If you do not wish to share files embedded with your geo-location information with us, please do not upload them. If you don’t want to store location data in your photos or videos, please consult the documentation for your camera to turn off that feature. Also, some of the information we collect from a Device, for example IP address, can sometimes be used to approximate a Device’s location.



Analytics. We also collect some information (ourselves or using third party services) using logging, such as IP address, which can sometimes be correlated with Personal Information. We use this information for the above purposes and to monitor and analyze use of the Services, for the Services's technical administration, to increase our Services's functionality and user-friendliness, and to verify users have the authorization needed for the Services to process their requests.

3. Information Sharing and Disclosure

Your Use. Any information you choose to provide should reflect how much you want others to know about you. Please consider carefully what information you disclose and your desired level of anonymity. We do not sell your personal information to third parties.

Services Providers, Business Partners and Others. We may use certain trusted third party companies and individuals to help us provide, analyze, and improve the Services (including but not limited to servers, data storage, maintenance services, database management, web analytics, and improvement of the Services's features). These third parties may have access to your information only for purposes of performing these tasks on our behalf and under obligations similar to those in this Privacy Policy.

X2M Customer Portals. Our X2M Connect Limited customers may use Services as part of their service offering to you. These X2M Customers may have access to your information for the purposes of performing their services for you and their access is controlled by them under their obligations to you similar to those in this Privacy Policy.

Third-Party Applications. We may share your information with a third party application with your consent, for example when you choose to access our Services through such an application. We are not responsible for what those parties do with your information, so you should make sure you trust the application and that it has a privacy policy acceptable to you.

Compliance with Laws and Law Enforcement Requests; Protection of X2M Connect Limited's Rights. We may disclose to parties outside X2M Connect Limited files stored in your Services and information about you that we collect when we have a good faith belief that disclosure is reasonably necessary to (a)



comply with a law, regulation or compulsory legal request; (b) protect the safety of any person from death or serious bodily injury; (c) prevent fraud or abuse of X2M Connect Limited or its users; or (d) to protect X2M Connect Limited's property rights. If we provide your X2M Connect Limited files to a law enforcement agency as set forth above, we will remove X2M Connect Limited's encryption from the files before providing them to law enforcement. However, X2M Connect Limited will not be able to decrypt any files that you encrypted prior to storing them on X2M Connect Limited.

Business Transfers. If we are involved in a merger, acquisition, or sale of all or a portion of our assets, your information may be transferred as part of that transaction, but we will notify you (for example, via email and/or a prominent notice on our website) of any change in control or use of your Personal Information or Files, or if either become subject to a different Privacy Policy. We will also notify you of choices you may have regarding the information.

Non-private or Non-Personal Information. We may disclose your non-private, aggregated, or otherwise non-personal information, such as usage statistics of our Services.

4. Changing or Deleting Your Information

If you are a registered user, you may review, update, correct or delete the Personal Information provided in your registration or account profile by changing your "account settings." If your personally identifiable information changes, or if you no longer desire our service, you may update or delete it by making the change on your account settings. In some cases, we may retain copies of your information if required by law. For questions about your Personal Information on our Services, please contact privacy@x2mconnect.com. We will respond to your inquiry within 30 days.

If you are using the services provided by one of X2M Connect Limited's customers and not directly with X2M Connect Limited then please contact your provider to enquire regarding your Personal Information.

5. Data Retention

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request



that we no longer use your information to provide you services, you may delete your account by contacting us at privacy@x2mconnect.com. We may retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Consistent with these requirements, we will try to delete your information quickly upon request. Please note, however, that there might be latency in deleting information from our servers and backed-up versions might exist after deletion. In addition, we do not delete from our servers files that you have in common with other users.

If you are using the services provided by one of X2M Connect Limited customers and not directly with X2M Connect Limited then please contact your provider to enquire regarding your Personal Information.

6. Security

We follow generally accepted standards to protect the information submitted to us, both during transmission and once we receive it. No method of electronic transmission or storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. If you have any questions about security, you can contact us at privacy@x2mconnect.com

7. Contacting Us

If you have any questions about this Privacy Policy, please contact us at privacy@x2mconnect.com

8. Changes to our Privacy Policy

This Privacy Policy may change from time to time. If we make a change to this privacy policy then we will post it on the company website at www.x2mconnect.com. By continuing to use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

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