

PRIVACY POLICY

Effective October 26, 2021

PURPOSE

Timex Group USA, Inc., (“Timex”) does not own, collect, store, transmit, maintain, manage, sell or use your personal data in any manner. Your privacy is important to Timex. We developed this Privacy Policy so you know how your personal data is processed when you use our Timex Pay service. Timex does not have the server database to store it. Timex uses a third-party service provider to manage any personal data input or associated with this product and app. Timex has, therefore, posted the Privacy Policy to provide details on how the third-party service provider manages your personal information. The third-party service provider is Tappy Technologies Limited ("Tappy"). All individuals whose responsibilities include the processing of personal information on behalf of Tappy are expected to protect that data by adherence to this Privacy Policy. This Privacy Policy is intended to meet requirements globally, including those in North America, Europe, APAC, and other jurisdictions.

OUR COMMITMENT TO YOU

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of and confidence in our personal information collection and usage practices of any personal information provided to Tappy.

In this Privacy Policy, "personal information" means any information relating to an identified or identifiable natural person. Such personal information may include, but is not limited to the information you provide to us or upload and information we obtain through your devices as described below.

We are committed to protecting the privacy, confidentiality and security of your personal information by complying with applicable laws. We are equally committed to ensuring that all our employees and agents uphold these obligations.

Ultimately, what we want is the best for all our users. Should you have any concerns with our data handling practice as summarized in this Privacy Policy, please contact connected.products@timex.com.

WHAT INFORMATION DO WE COLLECT?

We may collect the following information from you or your device as you use the mobile app: information you input into the app (name, email, phone number), transactional data (made using the payment wearable), geolocation (if enabled on your device), IP address, other device-related information such as the make and model of your device, its operating system and the date and time of your use.

HOW WE USE THIS INFORMATION

We may use this information to facilitate the operation of our apps, to help us understand how our users use the app, for our reporting and analytics, authentication, and security (including fraud prevention).

We may disclose your information to our service providers and partners who assist us in providing mobile app services to you. These service providers and partners may be in Canada or other jurisdictions and may

access, use, or disclose your information to meet legal or regulatory obligations, including responding to requests from government, regulators, courts and law enforcement authorities, in those jurisdictions.

Please note the ability to collect certain personal information is controlled by your device. For example, your device may control the ability to disclose your device's geolocation or provide access to your contacts, photos and/or camera. Please refer to the documentation for your device regarding how to allow or block the collection of location or certain device information. If you choose not to provide location or certain device information, some services you request may not operate effectively.

WHY WE COLLECT THIS INFORMATION

The following table lists the type of information we collect and why:

Information we collect	Why we collect this information
Transactional data and other information you provide through the app or you have allowed the app to obtain.	We collect your transaction and other information to provide you with services through our apps.
Geolocation: If allowed, the estimated physical location of your device.	We may need to know your location for security purposes and fraud prevention when you add a card to your wearable device
IP Address: A unique numerical label that identifies your device and allows it to communicate over a computer network.	<p>We use your IP address for following purposes:</p> <ul style="list-style-type: none"> · Communicating with your device · Providing you with services · Identifying your jurisdiction for legal and regulatory purposes · Authentication and security (including fraud prevention)
<p>Other Device-related information:</p> <ul style="list-style-type: none"> · Device ID: A unique number that identifies your device. · Mobile phone number. · Make and model of your device. · Operating system of your device. · Date and time of your use of the mobile app. 	<p>We use this information to:</p> <ul style="list-style-type: none"> · Identify and communicate with your device (e.g., send push notifications) · Add payment card to your wearable device (e.g., payment network requirements for Visa, Mastercard) · Authenticate you and your device. · Perform analytics. · Prevent fraud. · Determine the eligibility of your device.

APP PERMISSIONS

When you download the application on your mobile device, depending on your OS and software version, you will be asked to accept some permissions either the first time you download the app, or at the time you access specific features within the app. The following chart lists the permissions requested by our mobile app and why we need to access those features:

Permission	Why we need to access this feature
Location	We may need to know your location for security purposes and fraud prevention when you add a card to your wearable device.
Camera	We may require camera access, to populate information relevant to certain actions (e.g., scan and populate the payment card number when adding a card to your wearable device).
Notifications	We would require permission to send notifications on your mobile device to inform you about the virtual card/token life cycle events and payment transaction notifications when you pay with your wearable device.
Bluetooth	We would require access to Bluetooth to connect and communicate with the wearable device when you are adding a card to your wearable device.

INFORMATION USAGE AND THIRD-PARTY SHARING

We will only use your information in a manner consistent with this Privacy Policy, unless you have specifically consented to another type of use, either at the time such information is collected or through some other form of consent from you or notification to you. Personal information and location-based information is treated as sensitive information by Us and are subject to a heightened standard for sharing, as opposed to non-personal or de-identified information which may be shared with any number of parties. Therefore, we may use your information to:

- respond to your inquires or requests;
- send you information about the Service (such as promotions, maintenance or security information);
- send you a limited number of offers for additional products and services that may interest you, but we will not provide your personal information to third parties for them to contact you directly for their own benefit without your consent;
- permit our vendors and subcontractors to perform services, provided they are under an obligation of confidentiality and do not use the information for their own benefit;
- comply with applicable law or legal process;
- provide to a third party for their own use, such as marketing, but only if you have specifically opted-in to such third-party sharing;
- investigate suspected fraud, harassment, danger to persons or property or other violations of any law, rule or regulation, or the terms or policies for the Service or our business partners;
- share with law enforcement and other parties trying to locate a lost child
- develop and enhance our own data, such as through tracking the location of your Timex Device, provided that any disclosures of such data does not specifically identify you, your Timex Device or your specific location;
- transfer information in connection with the sale or merger or change of control of Timex or the division responsible for the services with which your information is associated;
- share non-personal or de-identified information with any number of parties, including analytics companies, technologies providers and other business partners; or

- combine it with data from other sources outside of your use of the Service, such as data obtained from wi-fi access points within range of your Timex Device.

AUTO DELETION OF DATA

We may automatically delete data from a Timex device or from the Timex app in connection with a returned or terminated account or device, or as necessary to protect against unauthorized access to the data.

SECURITY

The security of your information is very important to us. We use reasonable efforts to protect it from unauthorized access. However, due to the inherent open nature of the Internet and wireless communications, we cannot guarantee that your personal information will be completely free from unauthorized access by third parties, such when transferred over or through systems not within our exclusive control. Your use of our Service demonstrates your assumption of this risk. We have put in place reasonable physical, electronic, and managerial procedures to safeguard the information we collect. Only those employees who need access to your information in order to perform their duties are authorized to have access to your personal information. For more information on protecting your privacy, please visit www.ftc.gov/privacy.

PERSONAL INFORMATION FROM CHILDREN

The Service is intended for an adult over 18 years of age. By providing the Timex Device to a child, you represent and warrant to Timex and Us that you are authorized by such child's parent or guardian to enable and permit Us to operate the Service and collect and use the information from the child as stated herein.

DATA RETENTION

We may retain your information for as long as we feel that there is a business need or benefit to do so. This will include retaining location-based information.

OTHER SERVICES

As a convenience to you, we may provide links to third party services from within the Service. We are not responsible for the privacy practices or content of these third-party services and such links should not be construed as an endorsement of any such third-party services. When you link away from the Service, you do so at your own risk.

CHANGES TO THIS PRIVACY POLICY

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. However, if at any time in the future we plan to use personal information or location-based data in a way that materially differs from this Privacy Policy, such as sharing such information with more third parties, we will post such changes here and provide you the opportunity to opt-out of such differing uses. Your continued use of the Service following the posting of any changes to this Privacy Policy means you accept such changes.

OPT-OUT PROCESS

You may unsubscribe from our marketing messages. All unsubscribe or opt-out requests should be sent to us at connected.products@timex.com and we will process your request within a reasonable time after receipt. However, we are not responsible for removing your personal information from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy or your consent, such as a sponsor. You should contact such third parties directly.

If you no longer want any data collected by the Service from the Timex Device, then you will need to deactivate the service.

PERMISSION

By using the Service, you freely and specifically give us your consent to export your personal information and to store and use it as specified in this Privacy Policy. You understand that data stored in the USA may be subject to lawful requests by the courts or law enforcement authorities in the USA.

CONTACT

For questions or concerns relating to privacy, we can be contacted at: connected.products@timex.com – 1 (800) 328-2677 – Timex, 555 Christian Road, Middlebury, Connecticut 06762 USA