



# Locaid® Privacy Policy for Web Services

EFFECTIVE DATE: DECEMBER 20, 2009

## Overview

Locaid enables location-based services (LBS) for mobile devices through wireless networks around the world by utilizing the geographical position of the device. Locaid services enable a variety of applications in business and consumer contexts including health, work, personal life, community and communications. Locaid helps companies identify the location of a person or object, such as finding the nearest ATM machine, verifying the location of a vehicle, or confirming the whereabouts of a friend or employee. Locaid works with developers and companies to provide location data and analytics for a wide range of LBS applications, including location-based vehicle tracking, parcel tracking, mobile commerce, mobile advertising, social networking, “presence”-based messaging and location-contextual gaming. In this role, Locaid serves as an aggregator for location based services by which it brings together – or operates as a mediation gateway for – wireless carriers and the providers of wireless applications and content (“Providers”). Locaid’s customers are businesses, not consumers. Locaid transmits to Providers the location data of individuals who purchase and use mobile location services (“Mobile Location Users”).

This Privacy Policy (“Policy”) identifies and describes the way Locaid uses and protects the information we collect from those who visit our Web sites such as the site you are visiting now. Your visits to [www.Locaid.com](http://www.Locaid.com), and other Web sites we operate are subject to this Privacy Policy.

This Policy and our Frequently Asked Questions (FAQs) are incorporated by reference into our Terms of Use for this web site. Please visit our FAQs or more information about how we collect, use and disclose personal information.

## 1. The Kinds of Information We Collect

When a User visits a Locaid Web site, we automatically collect non-personally identifiable information through the use of electronic tools, including the following:

- Cookies,
- Web beacons,
- Widgets,
- IP addresses,
- Server logs.

For an explanation about how these electronic tools work, please visit our FAQs.

## Website Users

If you visit a Locaid Web site, you might be asked to provide one or more of the following types of information:

- Name,
- Address,
- Telephone number,
- E-mail address,
- Legal Age if required by law,
- ID and password for the Web site.

## 2. How We Use the Information We Collect

We may store and process the information we collect (including Personal Information which can identify an individual Web site visitor) for a number of reasons:

- to ensure that Web site visitors have the best experience possible;
- to provide the services purchased by our business customers;
- to respond to our customers' questions or answer Web site-related questions;
- to analyze, manage, and improve our Web sites;
- to address network integrity and security issues;
- to investigate, prevent, or take action regarding illegal activities and/or violations of our Terms of Service.
- Please visit our FAQs for additional information.

### 3. Sharing Information With Others

We may share Personal Information with others, but only in certain circumstances explained below.

#### Service Providers

We may share Personal Information with service providers who perform services on our behalf. In such cases:

we require those non-Locaid companies to protect any Personal Information they may receive in a manner consistent with this Policy; and

we do not provide Personal Information to non-Locaid companies for marketing of their own products and services without your consent.

#### Other Entities Such as Government Agencies, Courts, and Collections Agencies

We may also share Personal Information for the following reasons:

- we may provide it to emergency, law enforcement authorities, government agencies, courts or other entities to comply with subpoenas, court orders, legal processes, or if we believe in good faith the law requires it;
- to a court or other competent legal authority to enforce our agreements and property rights; and
- to third parties (such as collection agencies) to obtain payment for our products and services, such as the transfer or sale of delinquent accounts.

We may share aggregate or anonymous information – that is, information that doesn't identify an individual – with the following types of trusted partners for the following purposes:

- Retail, marketing, and advertising companies that offer products and services that may be of interest to our business customers;
- Universities, laboratories, and other entities that conduct scientific research; and,
- Media research companies that may use the data for purposes such as municipal planning and coordinating disaster responses.
- Government entities that may use the data for purposes such as municipal planning and coordinating disaster responses.

### 4. Online Privacy for Children

Locaid Web sites are not directed to children under the age of 13. We direct our efforts to Business Customers, and we do not knowingly collect Personal Information from anyone under the age of 13. Furthermore, we explicitly follow all guidelines of our wireless carrier partners with respect to parental controls.

Please visit our FAQs for additional information with respect to online privacy for children.

### 5. Safeguarding your Information – Data Protection and Security

- Locaid takes the following steps to ensure that Personal Information is kept secure:
- We do not sell Personal Information for any purpose;
- We retain Personal Information only until it is no longer needed for business, tax or legal purposes;
- We implement encryption or other appropriate security measures to protect Personal Information when stored or transmitted by Locaid;
- We have put in place many internal controls and administrative procedures; and

In our contracts with other companies that perform services on our behalf, we require them to protect any Personal Information they may receive in a manner consistent with this policy and we do not allow them to use such information for any other purpose.

Our FAQs provide additional information about the data protection and security measures we take.



Get your Location  
API now at: [http://  
developer.loc-aid.com/  
getit](http://developer.loc-aid.com/getit)

## 6. Privacy Controls and Choices

If we have collected your Personal Information directly from you or indirectly from other sources, we will provide you with control and choices over how it is used:

- You can review and correct Personal Information collected by us by contacting us a [privacy@Locaid.com](mailto:privacy@Locaid.com);
- You can also limit certain types of solicitations and communications from Locaid, including marketing or sales-related communications via telephone, e-mail, and text messaging by contacting us a [privacy@Locaid.com](mailto:privacy@Locaid.com);
- E-mails that we send you will include an opt-out link;
- To opt out of targeting advertising from many ad networks, click here [embed URL <http://www.networkadvertising.org>] to access the Network Advertising Initiative.

## 8. How to Contact Us

We would be happy to address any questions or concerns you may have about our privacy or practices. Please contact us at [privacy@loc-aid.com](mailto:privacy@loc-aid.com) or write to us at

Locaid  
ATTN: Privacy Group  
50 Fremont Street, Suite 2225  
San Francisco, CA, 94105

For any questions about your service or account not related to privacy, please contact us at [cs@loc-aid.com](mailto:cs@loc-aid.com) or click the upper right hand corner of our website and you will be directed to Locaid customer service or technical support assistance. You can also access your online account from the upper right hand corner of our home page at [www.loc-aid.com](http://www.loc-aid.com).

## 7. Changes to this Privacy Policy

Locaid reserves the right to change this policy at any time. We will post a notice on this Web site if this policy changes in a non-material (that is, important) way.

If we change this Policy in a manner which is material and which affects the way we handle the Personal Information collected under the prior version of this policy, we will endeavor to notify affected individuals and provide choices as to how such Personal Information will be handled on a going-forward basis.



Get your Location  
API now at: [http://  
developer.loc-aid.com/  
getit](http://developer.loc-aid.com/getit)

### About Locaid

Locaid is the world's largest Location-as-a-Service (LaaS) company. We operate a location privacy platform that allows mobile developers to locate over 350 million devices for enterprise authentication, fraud management, consumer location services and opt-in mobile marketing. Locaid locates smartphones, feature phones, tablets and any mobile device on leading wireless carriers including América

Móvil, AT&T, Rogers, Sprint, T-Mobile and Verizon Wireless. Locaid also helps shape and enforce location privacy policies via leadership roles on governing associations including the CTIA, MMA and IAPP. The largest financial institutions, mobile marketers, M2M platforms and mobile service providers get network location from Locaid. Location Matters.™ You can locate us at <http://www.loc-aid.com>.

