

PRIVACY POLICY

Last modified: February 10, 2020

This Privacy Policy describes how Headset, Inc. (“Headset,” “we,” or “us”) may collect and use personal information (“information”) about individuals (collectively “you”) in connection with your use of the Headset owned and operated websites available via headset.io and its subdomains (the “Sites”) or any other Headset products or services that reference or otherwise incorporate this Privacy Policy (such Sites, services and products collectively “the Services”).

Please note that this Privacy Policy does not apply in the following circumstances:

- *Third-Party Sites:* The Services may include links or references to websites, services or materials that are not controlled by us. This Privacy Notice does not apply to such third-party sites, which are subject to their own privacy notices.
- *Existing Customers and Users:* In some cases, we may access or use your information on behalf of a retailer or other third-party who is our customer (“Customer”) and we will treat your information as prescribed in the respective agreements between us and our Customer rather than as described in this Privacy Policy. In such cases, our Customer’s privacy policy will apply with respect to how your information will be handled and how you may exercise any applicable data subject rights.

We recognize that privacy is an ongoing responsibility and we will update this Privacy Policy as we adopt new privacy practices. If we make any material changes to this Privacy Policy, we will notify you by email or by means of a notice on this website.

1. INDIVIDUALS UNDER THE AGE OF 18

The Services are not intended for individuals under 18 years of age. If you are under 18 you are not permitted to provide any information on or use the Services. We do not knowingly collect information from individuals under 18 years of age. If we learn we have collected or received information from any individual under 18 years of age, we will delete that information.

2. INFORMATION WE COLLECT ABOUT YOU

We will only collect your information about you in accordance with applicable law. The information we collect depends on the context of your interactions with us and the choices you make, including your own privacy settings and the specific Services you use.

Depending on your particular use, we collect your:

- personal identifiers (such as your real name, postal address, phone number, email address or other similar identifiers);
- commercial information (such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, financial information in connection with your purchases);
- internet or other electronic network activity information (ie browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement);
- audio or visual information in connection with any calls or meetings that have been recorded;
- professional, educational or employment related information;
- any other information you communicate to us directly during your communications with us; and

- inferences drawn from the foregoing.

3. SOURCES OF INFORMATION.

We may collect your information both online (for example, through your use of our websites and products) and offline (for example at events or over the phone) and we may combine information collected from disparate sources. Most of the information we collect or maintain about you is provided directly by you to us, including:

- Information that you provide by filling in forms or otherwise submitting content on the Services (including information provided at the time of registering to use the Sites, subscribing to the Services, or requesting further services).
- Information you provide when you report a problem with the Sites or otherwise contact us for support.
- Records and copies of your correspondence (including email addresses) with us; and
- Your responses to surveys that we might ask you to complete for research purposes.

Such information typically includes personal identifiers, commercial information, audio or visual information and professional or educational information. If you do not want to provide us with your information you may decide at any time not to visit our sites, install our apps, or provide information to directly us. However, if you choose not to provide us with certain information, we may not be able to provide certain Services to you.

Automatic Data Collection Technologies. As you navigate through and interact with the Sites, we may use automatic data collection technologies to collect certain internet or other electronic network activity information about your equipment, browsing actions, and patterns, including:

- Details of your visits to the Sites, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Sites.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically helps us to improve the Sites and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize the Sites according to your individual interests.
- Recognize you when you return to the Sites.

We may use cookies in connection with automatic data collection through the Services. A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of the Sites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Sites.

Third-party collection. From time to time, and where permitted by applicable laws, we may obtain information about you from third party sources, such as public databases and websites, retailers and distributors, marketing or business partners, and social media platforms. Such information typically includes personal identifiers, commercial information and internet information from business partners with which we operate co-branded events, services, marketing campaigns or joint offerings.

4. HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us:

- To present the Sites and its contents to you.
- To provide, improve and develop Headset products and services.
- To communicate with you and provide you with information, products, or services that you request from us.
- To process transactions for you or to fulfill any other purpose for which you provide your information.
- To provide you with quality assurance and support for the Services.
- To provide you with notices about your account and subscriptions, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts.
- To notify you about changes to the Sites or Services.
- To prevent or investigate fraudulent or inappropriate uses of the Services.

We may also use your information as otherwise disclosed to you at the point of the collection of your information or as otherwise consented to by you. Where permitted by applicable law, we may aggregate and anonymize the information of our users and may make full use of such aggregated and anonymized data.

Marketing and opt-outs. Where permitted by applicable law, and with your prior consent where required by applicable law, we may also use your information for marketing purposes, including direct marketing to you via email, telephone or any other marketing channel, and to provide you with promotional communications about our products and services. You can unsubscribe from further marketing at any time, as further detailed in Section 6 of this Privacy Policy.

5. DISCLOSURE OF YOUR INFORMATION

We may share your information with third-parties solely as permitted by law and only as described below or as otherwise expressly permitted by you.

We may disclose your information:

- To service providers we use in connection with providing the Services.
- 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 Headset's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our website terms of service or other agreements for Headset products and services, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Headset, our customers, or others.

All third-parties that we may share your information with are obliged to keep your information confidential, secure and in manner no less protective of your information than this Privacy Policy.

6. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION; ACCESSING AND CORRECTING YOUR INFORMATION



We strive to provide you with choices regarding the information you provide to us. We have created mechanisms to provide you with the following control over your information:

- *Tracking Technologies.* You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of the Sites may then be inaccessible or not function properly.
- *Promotional Offers from the Company.* You can unsubscribe from marketing communications from us at any time by selecting the "unsubscribe" link at the end of the various marketing and promotional communications we send you, or by submitting your request to privacy@headset.io. Please keep in mind that even if you unsubscribe from our marketing communications, we may still contact you for other legitimate reasons (e.g. in relation to an order you placed, an inquiry you made, an event for which you registered, a legally required notice, etc.).

7. YOUR PRIVACY RIGHTS

Depending on your location and home jurisdiction, you may have additional rights, including rights under the California Consumer Privacy Act of 2018 ("CCPA"), regarding how we use and share your information, including:

- The right to access your information;
- The right to request further details about how we collect, use, disclose or sell your information;
- The right to request that we delete your information that we collected from you;
- The right to opt-out of the sale of your information, if applicable; and
- The right not to receive discriminatory treatment from us based on your exercising of any other consumer rights under the CCPA.

To obtain more information about exercising your rights, including how to designate an authorized agent to make a consumer request for you, please send an email to privacy@headset.io.

Please be advised that upon the receipt of your request, we may ask you to provide additional information so that we can verify your identity and process your request. In limited circumstances we may refuse to accommodate your request, for example if we believe the request is fraudulent or would violate any law or legal requirement.

For the purposes of the CCPA, we do not sell your information, except where you explicitly consent to such sale, in which case we will present you with further information about how your information may be sold and your ability to opt-out of such sale at the time of collection.

8. DATA TRANSFER AND SECURITY

We may process your information in the United States or any other country in which we (or our service providers) have a presence or data processing facility. Similarly, we may transfer information from the country in which you are located to the United States or any other country in which we (or our service providers) have a presence or data processing facility. We will comply with all applicable laws relating to the processing and transfer of your information.

We take all reasonable and appropriate steps to help protect your information in an effort to prevent loss, misuse, and unauthorized access, disclosure, alteration, and destruction. We use appropriate technical and organizational measures to protect your information. The measures we take to protect your information may include physical access controls, encryption, internet firewalls, intrusion detection and network monitoring depending on the nature of the information and the scope of processing. Our personnel who have access to your information are required to keep that information confidential.



9. HOW TO CONTACT US

If you would like to opt-out of select communications from us or if you have questions or concerns related to this Privacy Policy, you may contact us via email at privacy@headset.io.

You may also contact us by mail at our primary place of business: Headset, Inc., 307 Third Avenue South, Suite 300, Seattle, WA 98104.