

ESPIAL ELEVATE DEMONSTRATION SERVICES PRIVACY POLICY AND CALIFORNIA PRIVACY RIGHTS STATEMENT

INTRODUCTION

This Privacy Policy applies to the Espial Elevate Demonstration Services, including the Cloud One Voice App, which are owned, operated, published and licensed by Espial Group Inc. ("**Espial**"). This Privacy Policy sets out Espial's collection, use and disclosure of personal information through the Espial Elevate Demonstration Services, which may include the Elevate User Interface.

IMPORTANT NOTICE: The Espial Elevate Demonstration Services and Cloud One Voice App are being published for demonstration purposes only and are not intended for consumer use. Use of the Espial Elevate Demonstration Services and Cloud One Voice App is at your own risk.

WHAT DOES THIS PRIVACY POLICY COVER?

Except as noted in the next paragraph, this Privacy Policy applies to you if you downloaded or otherwise received, installed or use the Espial Elevate Demonstration Services, including through voice activation or the Cloud One Voice App ("**Services**") on any device connected to variants of Google Home or Google Assistant or other device providing similar functions (collectively, "**Device**").

By downloading, installing and/or using the Espial Elevate Demonstration Services, you agree to the provisions of this Privacy Policy.

1. Espial Collection and Use of Information.

Espial collects various categories of information in connection with the use of the Services. Some of this information specifically identifies you or your household. Some of the information is anonymous in that you or your household is not associated with the information. "Personal Information" refers to any personally identifiable or anonymous information relating to you or your use of our Services. The following are more specific types of Personal Information.

1.1 Account Information.

If you link your Google account ("**Account**") to the Espial Elevate Demonstration Services, Espial will collect certain Account Information, including your Google Account user ID, email address, your Device type and model number and any other information identified to you when link your Account. Espial only collects information that is necessary for us to provide the Services. Espial may also collect certain information necessary for Espial to provide Services to your Device ("**Service Information**"). Examples of Service Information include your software version number and the last attempted connection between your Device and Espial servers. The Service Information is always transmitted to Espial when the Device is connected to the Espial Services.

We also use your Account Information in aggregate, anonymous form to better understand how our subscribers use our services, which services they use and who is likely to be interested in receiving certain services and other legitimate business purposes. This is not Personal Information.

1.2 Command Information.

Command Information is Personal Information about commands and searches made by you while using the Espial Elevate Demonstration Services. Espial will collect this information for the purpose of executing and evaluating the Espial Elevate Demonstration Services.

2. Espial Disclosure of Personal Information to Third Parties.

We may disclose aggregated, anonymous Account Information, Service Information, and Command Information to create reports derived from such information. We may provide this information to third parties including our service providers, advertisers, merchants, consumer and market research companies and other organizations. This does not include Personal Information.

2.2 Factors Beyond our Control; Compliance with the Law: Protection of Our System and Services.

Your privacy is very important to us. Due to factors beyond our control, however, we cannot fully ensure that your Personal Information will not be disclosed to unintended third party recipients. For example, we may be legally obligated to disclose Personal Information to the government or third parties under certain circumstances such as a legal demand issued by a government entity, a subpoena issued in connection with a civil or criminal investigation or litigation or a court order. We may also determine that, the provisions above notwithstanding, it is necessary for us to disclose Personal Information to comply with applicable laws, to enforce our policies, to protect the integrity of our operations and to protect our customers or to prevent a crime. We will only disclose Personal Information as required or permitted by law. Further, third parties may circumvent our security measures to unlawfully intercept or access your Personal Information.

3. Your Choices Regarding Personal Information.

3.1 Initial Privacy Settings.

Due to the nature of the Espial Elevate Demonstration Services, which are intended for demonstration purposes only, users will not have any options to change the privacy settings associated with the Espial Elevate Demonstration Services.

3.2 Review and Update of Account Information.

You may review your Personal Information collected and stored by us and may ask us to change or update this information. If you would like to review your Account Information, you may access your account at the portal where you would log into your account and may make changes to your Account Information there. You can also get access to and/or update your Personal Information by sending us a request in writing to the email set out in the Contact Us section below. Unless otherwise required or permitted by law, Espial will provide you with access to all Personal Information in our possession.

4. Information from Children.

We feel strongly about protecting the privacy of children and encourage parents to be involved in their minor children's use of the Services. We comply with all applicable laws designed to protect children's information. If a child informs us that he or she is under the age of 14, we will delete such information.

5. Security of Personal Information.

When you contact us by email or phone regarding your account, for your security, we ask you for certain Account Information to verify your identity before accepting requests to make changes to the account. We take these steps to ensure that only you or a household member who knows your Account Information will be able to access or change your Subscriber Information. We use industry-standard security methods, such as encryption, to secure the communication of viewing information from your Device to us. In addition, we use industry-standard methods of securing our databases that house Personal Information. Except as provided elsewhere in this Privacy Policy, Espial limits access to Personal Information databases to those persons in the Espial organization who have a business need for such access.

Espial stores Personal Information on servers located in Canada and the United States. By using the Services, you consent to your Personal Information being transferred to, processed and stored in that jurisdiction. You acknowledge and agree that your Personal Information may be accessible to law enforcement or governmental agencies in that jurisdiction under local laws.

General.

7.1 Future Features, Services, and Amendments to this Privacy Policy.

We may upgrade the Services from time to time. To the extent that any new features or services may require amendments to this Privacy Policy these amendments are effective upon notice to you. In the event that we make a substantial and material change to our treatment of Personal Information, such as a change in the way that we collect, use, or disclose Personally Identifiable Program Information, we will notify you of such planned change and offer you the opportunity to alter your privacy preferences. We may notify you of any such revisions by posting notice of the changes on our website (<https://espial.com/legal/>) or on the Services or by electronic or regular mail. Your continued use of the Services following notification of changes to the Privacy Policy will mean you accept those changes.

7.2 Retention

Any Personal Information collected through the use of the Services will be retained only for as long as it is needed to provide the Espial Elevate Demonstration Services or any other valid business purpose disclosed in this Privacy Policy or as permitted by law.

7.3 Technical Problems.

Even though we have taken significant steps to ensure that your Personal Information is never collected, used, or disclosed by us except as set forth by this Privacy Policy, technical mistakes are possible. If such a mistake takes place, we will take commercially reasonable steps to correct it.

7.4 Contact Us.

Our intention is to be diligent in protecting your privacy by carefully following our Privacy Policy. If you would like to make suggestions or find out more about our privacy practices, please email us at info@espial.com.

7.5 Interpreting this Privacy Policy.

Examples listed in this Privacy Policy are provided to assist your understanding of this Privacy Policy and are not intended as exhaustive lists. Section headings are provided for your convenience.

7.6 Your California Privacy Rights

Pursuant to California law, if you downloaded or otherwise received, installed or use the software and/or services of the Espial Elevate Demonstration Services, you may request the following information, which will be provided to you either in writing or e-mail free of charge: (1) a list of the categories of personal information disclosed by Espial Group Inc to third parties (which may include your service provider) for the third parties' direct marketing purposes during the immediately preceding calendar year and (2) the names and addresses of all third parties that received personal information from Espial Group Inc for the third parties' direct marketing purposes (again, which may include your service provider) during the preceding calendar year and, if the nature of the third parties' business cannot reasonably be determined from the third parties' name, examples of the products or services marketed, if known to Espial Group Inc, sufficient to give you a reasonable indication of the nature of the third parties' business. Consumer requests for this information should be sent to info@espial.com.

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