

Privacy Policy

Effective date: August 27, 2020

At Turing Video, we take your privacy seriously. Please read this Privacy Policy to learn how we treat your personal data. By using or accessing our Services in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and share your information as described in this Privacy Policy.

Please note that the Services are currently only available to U.S. citizens or permanent residents age 18 and older. You may not use the Services if you are under the age of 18 or not a U.S. citizen or permanent resident.

Remember that your use of Turing Video's Services is at all times subject to our [Terms of Use](#), which incorporates this Privacy Policy. Any terms we use in this Policy without defining them have the definitions given to them in the Terms of Use.

If you have a disability, you may access this Privacy Policy in an alternative format by contacting support@turingvideo.com.

TABLE OF CONTENTS

What this Privacy Policy Covers

Personal Data

- Categories of Personal Data We Collect
- Categories of Sources of Personal Data
- Our Commercial or Business Purposes for Collecting Personal Data

How We Share Your Personal Data

Data Security and Retention

Personal Data of Children

California Resident Rights

Other State Law Privacy Rights

Changes to this Privacy Policy

Contact Information

WHAT THIS PRIVACY POLICY COVERS

This Privacy Policy covers how we treat Personal Data that we gather when you access or use our Services. “Personal Data” means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations. This Privacy Policy does not cover the practices of companies we don’t own or control or people we don’t manage.

PERSONAL DATA

Categories of Personal Data We Collect

The charts below detail the categories of Personal Data that we collect and have collected over the past 12 months:

A. Enterprise Customer Personal Data

The Services permit our enterprise customers (“Enterprise Customers”) to collect certain Personal Data from you for their own purposes (“Enterprise Customer Personal Data”). We collect this Enterprise Customer Personal Data only on behalf of each Enterprise Customer. The collection, use and disclosure of your Enterprise Customer Personal Data will be governed by the applicable Enterprise Customer’s policies, including its privacy policy. Each Enterprise Customer is responsible for all its activity in connection with the Services, including obtaining all necessary consents or approvals from or by you, and providing all necessary notices to you. The Enterprise Customer Personal Data that we collect depends on the particular Services and the particular Enterprise Customer. For example, the Services enable you to, with your consent, provide Enterprise Customer Personal Data, including biometric and health information, to verify your identity, prevent against fraud and/or to provide other services to our Enterprise Customers, including facilitating access at locations that use the Services, including, if applicable, if your employer or a commercial establishment uses the Services for COVID-19 access screening. We collect your biometric information through the video and thermal imaging functions in the applicable hardware, in each case when you stand within the field of view of the applicable hardware. For more information on how we collect and use your biometric information, please see the “Categories of Sources of Personal Data” and “Our Commercial or Business Purposes for Collecting Personal Data” sections below.

Enterprise Customer Personal Data may include:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties with Whom We Share this Personal Data:
Biometric Data	<ul style="list-style-type: none"> • Faceprints (and facial mapping and scans of digitized images) 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate
Sensory Data	<ul style="list-style-type: none"> • Photos, videos or recordings of your environment 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate
Health Information	<ul style="list-style-type: none"> • Body temperature recordings 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate
Geolocation Data	<ul style="list-style-type: none"> • Geographic information (e.g. whether you have entered into a facility of an Enterprise Customer and your location while on premises) 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate
Professional or Employment-Related Data	<ul style="list-style-type: none"> • Employment status • Job title • Job history 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate
Inferences Drawn from Other Personal Data Collected	<ul style="list-style-type: none"> • Information reflecting user attributes or behavior (e.g., to assess risk of COVID-19) 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate

B. Cookies and Information Collected Automatically

We collect the following information automatically (e.g., through cookies) when you use or interact with the Services:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties with Whom We Share this Personal Data:
---------------------------	--------------------------------------	--

Device/IP Data	<ul style="list-style-type: none"> • IP address • Device ID • Domain server • Type of device/operating system/browser used to access the Services 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Web Analytics	<ul style="list-style-type: none"> • Web page interactions • Referring webpage/source through which you accessed the Services • Non-identifiable request IDs • Statistics associated with the interaction between device or browser and the Services 	<ul style="list-style-type: none"> • Service Providers • Advertising Partners • Analytics Partners • Parties You Authorize, Access or Authenticate
Physical Proximity & Tracing	<ul style="list-style-type: none"> • Contact tracing of individuals with whom you may have engaged in person or been in physical proximity during your presence at an Enterprise Customer location • Social distancing compliance 	<ul style="list-style-type: none"> • Enterprise Customers • Service Providers • Parties You Authorize, Access or Authenticate

The Services use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser, tell us how and when you visit and use our Services, analyze trends, learn about our user base and operate and improve our Services. Cookies are small pieces of data– usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Services. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Services do not support “Do Not Track” requests sent from a browser at this time.

We use the following types of Cookies:

- Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Services. Disabling these Cookies may make certain features and services unavailable.
- Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Services, maintain your preferences over time and recognize you when you return to our Services. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Services. They do this by collecting information about the number of visitors to the Services, what pages visitors view on our Services and how long visitors are viewing pages on the Services. Performance/Analytical Cookies also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Services’ content for those who engage with our advertising. For example, Google Inc. (“Google”) uses cookies in connection with its Google Analytics services. Google’s ability to use and share information collected by Google Analytics about your visits to the Services is subject to the Google Analytics Terms of Use and the Google Privacy Policy. You have the option to opt-out of Google’s use of Cookies by visiting the Google advertising opt-out page

at www.google.com/privacy_ads.html or the Google Analytics Opt-out Browser Add-on at <https://tools.google.com/dlpage/gaoptout/>.

You can decide whether or not to accept Cookies through your internet browser’s settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Services and functionalities may not work.

To explore what Cookie settings are available to you, look in the “preferences” or “options” section of your browser’s menu. To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <http://www.allaboutcookies.org/>.

C. Other Categories of Personal Information

We may also collect other categories of personal information about you to enable use of the Services, including:

Category of Personal Data	Examples of Personal Data We Collect	Categories of Third Parties with Whom We Share this Personal Data:
Profile or Contact Data	<ul style="list-style-type: none"> • First and last name • Email • Phone number • Unique identifiers such as passwords 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate
Payment Data	<ul style="list-style-type: none"> • Payment card type • Last 4 digits of payment card • Billing address, phone number, and email 	<ul style="list-style-type: none"> • Service Providers (specifically our payment processing partner, currently Stripe, Inc.) • Parties You Authorize, Access or Authenticate
Commercial Data	<ul style="list-style-type: none"> • Purchase history • Consumer profiles 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate
Geolocation Data	<ul style="list-style-type: none"> • IP-address-based location information 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate
Other Identifying Information that You Voluntarily Choose to Provide	<ul style="list-style-type: none"> • Identifying information in emails or letters you send us 	<ul style="list-style-type: none"> • Service Providers • Parties You Authorize, Access or Authenticate
Other	<ul style="list-style-type: none"> • Information about your use of the Services 	<ul style="list-style-type: none"> • Service Providers • Analytics Partners • Parties You Authorize, Access or Authenticate

Categories of Sources of Personal Data

We collect Personal Data about you from the following categories of sources:

- You
 - When you provide such information directly to us.
 - When you create an account or use our interactive tools and Services (e.g. when you enter the facility of one of our Enterprise Customers and have your temperature scanned for COVID-19 access screening).
 - When you voluntarily provide information in free-form text boxes through the Services or through responses to surveys or questionnaires.

- When you send us an email or otherwise contact us.
- When you use the Services and such information is collected automatically.
 - Through Cookies (as described above).
 - If you download our mobile application or use a location-enabled browser, we may receive information about your location and mobile device, as applicable.
 - If you download and install certain applications and software we make available, we may receive and collect information transmitted from your computing device for the purpose of providing you the relevant Services, such as information regarding when you are logged on and available to receive updates or alert notices.
- Third Parties
 - Service Providers:
 - We may use providers to analyze how you interact and engage with the Services, help us provide you with customer support, or to otherwise facilitate provision of the Services to you.
 - We may use vendors to obtain information to generate leads and create user profiles.
 - Business Partners and other Third Parties: We may receive information about you from our Business Partners and other third parties if you provide your credentials to us or otherwise authorize access by the Services to a third-party site or service. If you provide us with any credentials for third party services, you represent and warrant that you have the right to do so.

Our Commercial or Business Purposes for Collecting Personal Data

We may use Enterprise Customer Personal Data and any Personal Data we obtain about you for:

- Providing and Customizing the Services
 - Creating and managing your account or other user profiles.
 - Providing you with the products, services or information you request.
 - Providing the Services and support to our Enterprise Customers.
 - Verifying and authenticating your identity and user accounts.
 - Meeting or fulfilling the reason you provided the information to us.
- Meeting Legal Requirements and Enforcing Legal Terms
 - Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
 - Protecting the rights, property or safety of you, Turing Video or another party.
 - Enforcing any agreements with you.
 - Resolving disputes.
- We also may use your Personal Data in other ways with your express consent, for example when you choose to use a service or participate in a program we offer with another entity.

Additionally, we may also use Personal Data that is not Enterprise Customer Personal Data for:

- Providing, Customizing and Improving the Services
 - Providing support and assistance for the Services.
 - Processing orders or other transactions; billing.
 - Improving the Services, including testing, research, internal analytics and product development.

- Personalizing the Services, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act (the “CCPA”).
- Marketing the Services
 - Marketing and selling the Services.
- Corresponding with You
 - Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about Turing Video or the Services.
 - Sending emails and other communications according to your preferences or that display content that we think will interest you.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

HOW WE SHARE YOUR PERSONAL DATA

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below. We never sell or rent your Enterprise Customer Personal Data.

- Enterprise Customers. We share your Enterprise Customer Personal Data only with the particular Enterprise Customer(s) on whose behalf we collected your Enterprise Customer Personal Data.
- Service Providers. These parties help us provide the Services or perform business functions on our behalf. They include:
 - Hosting, technology and communication providers.
 - Security and fraud prevention consultants.
 - Support and customer service vendors.
 - Product fulfillment and delivery providers.
 - Payment processors.
 - Our payment processing partner Stripe, Inc. (“Stripe”) collects your voluntarily-provided payment card information necessary to process your payment.
 - Please see Stripe’s terms of service and privacy policy for information on its use and storage of your Personal Data.
- Analytics Partners. These parties provide analytics on web traffic or usage of the Services. They include:
 - Companies that track how users found or were referred to the Services.
 - Companies that track how users interact with the Services.
- Business Partners. These parties’ partner with us in offering various services. They include:
 - Businesses that you have a relationship with.
- Parties You Authorize, Access or Authenticate
 - Third parties you access through the services.
 - Other parties authorized by you.

Legal Obligations

We may share any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

Business Transfers

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices. Any such third party will assume the rights and obligations regarding your Personal Data described in this Privacy Policy.

Data that is Not Personal Data

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and share it with third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business. We may also share de-identified information with public interest organizations, health care organizations and researchers. We will not share such data in a manner that could identify you and will prohibit these third parties from attempting to re-identify any such data.

DATA SECURITY AND RETENTION

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, organizational and administrative security measures based on the type of Personal Data and how we are processing that data. You should also help protect your data by appropriately selecting and protecting your password and/or other sign-on mechanism; limiting access to your computer or device and browser; and signing off after you have finished accessing your account. Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data over the internet or storing data is completely secure.

We retain Personal Data about you for as long as you have an open account with us or as otherwise necessary to provide you with our Services. In some cases, we retain Personal Data for longer, if doing so is necessary to comply with our legal obligations, resolve disputes or collect fees owed, or is otherwise permitted or required by applicable law, rule or regulation. We may further retain information in an anonymous or aggregated form where that information would not identify you personally. The following are examples of security measures we use to safeguard your Personal Data:

- Turing maintains no Personal Data at any Turing facility or place of business or on any computer, server or device accessible by Turing employees, contractors or agents acting on behalf thereof. Storage of any retained Personal Data is provided by Amazon Web Services
- Turing employees, contractors and agents are explicitly prohibited from accessing Personal Data and only Turing employees whose role in maintaining the systems and technologies required to store securing customer data have access to said systems.

Retention of Biometric Information for Illinois Residents

If you are an Illinois resident, we retain your biometric information only until the first of the following occurs: (1) the initial purpose for collecting such biometric information has been satisfied; or (2) three years after your last interaction with the Services.

PERSONAL DATA OF CHILDREN

We do not knowingly collect or solicit Personal Data about children under 16 years of age; if you are a child under the age of 16, please do not attempt to register for or otherwise use the Services or send us any Personal Data. If we learn we have collected Personal Data from a child under 16 years of age, we will delete that information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at support@turingvideo.com.

CALIFORNIA RESIDENT RIGHTS

If you are a California resident, you have the rights set forth in this section. Please see the “Exercising Your Rights” section below for instructions regarding how to exercise these rights. Please note that we may process Personal Data of our customers’ end users or employees in connection with our provision of certain services to our customers. If we are processing your Personal Data as a service provider, you should contact the entity that collected your Personal Data in the first instance to address your rights with respect to such data.

If there are any conflicts between this section and any other provision of this Privacy Policy and you are a California resident, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at support@turingvideo.com.

Access

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months. In response, we will provide you with the following information:

- The categories of Personal Data that we have collected about you.
- The categories of sources from which that Personal Data was collected.
- The business or commercial purpose for collecting or selling your Personal Data.
- The categories of third parties with whom we have shared your Personal Data.
- The specific pieces of Personal Data that we have collected about you.

If we have disclosed your Personal Data to any third parties for a business purpose over the past 12 months, we will identify the categories of Personal Data shared with each category of third-party recipient. If we have sold your Personal Data over the past 12 months, we will identify the categories of Personal Data sold to each category of third-party recipient.

Deletion

You have the right to request that we delete the Personal Data that we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, we may need to retain your Personal Data to provide you with the Services or complete a transaction or other action you have requested. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

Exercising Your Rights

To exercise the rights described above, you or your Authorized Agent (defined below) must send us a request that (1) provides sufficient information to allow us to verify that you are the person about whom we have collected Personal Data, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a “Valid Request.” We may not respond to requests that do not meet these criteria. We will only use Personal

Data provided in a Valid Request to verify your identity and complete your request. You do not need an account to submit a Valid Request. We take the security and privacy of your Personal Data seriously, and we will not provide access to certain types of Personal Data such as financial account number, an account password, security questions and answers, or unique biometric data. We may require a notarized affidavit to verify your identity.

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may submit a Valid Request using the following methods:

- Call us at: (866) 816-7426
- Email us at: support@turingvideo.com

You may also authorize an agent (an “Authorized Agent”) to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

Personal Data Sales

In this section, we use the term ‘sell’ as it is defined in the CCPA. Based on our current understanding of the CCPA, we do not believe we sell your Personal Data. However, as described in this Privacy Policy, we have incorporated Cookies from certain third parties into our Services. These Cookies allow those third parties to receive information about your activity on our Services that is associated with your browser or device. Those third parties may use that data to serve you relevant ads on our Services or on other websites you visit.

We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA

We will not discriminate against you for exercising your rights under the CCPA. We will not deny you our goods or services, charge you different prices or rates, or provide you a lower quality of goods and services if you exercise your rights under the CCPA. However, we may offer different tiers of our Services as allowed by applicable data privacy laws (including the CCPA) with varying prices, rates or levels of quality of the goods or services you receive related to the value of Personal Data that we receive from you.

OTHER STATE LAW PRIVACY RIGHTS

California Resident Rights

Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties’ direct marketing purposes; in order to submit such a request, please contact us at support@turingvideo.com. Your browser may offer you a “Do Not Track” option, which allows you to signal to operators of websites and web applications and services that you do not wish such operators to track certain of your online activities over time and across different websites. Our Services do not support Do Not Track requests at this time. To find out more about “Do Not Track,” you can visit www.allaboutdnt.com.

Nevada Resident Rights

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. You can exercise this right by contacting us at support@turingvideo.com with the subject line “Nevada Do Not Sell Request” and providing us with your name and the email address associated with your account. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

Changes to this Privacy Policy

We’re constantly trying to improve our Services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on the Turing Video website, by sending you an email and/or by some other means. Please note that if you’ve opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

Contact Information:

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data or your choices and rights regarding such collection and use, please do not hesitate to contact us at:

- (866) 816-7426
- <https://www.turingvideo.com/>
- support@turingvideo.com
- 1730 South El Camino Real, Suite 350 San Mateo, California 94402