FORTRESS



REVISION HISTORY

Fortress Global, Inc. controls this document and therefore any printing of the material will constitute a "reference" copy. Users are responsible for confirming they have the current revision. When any part of this information requires an update, the entire document shall be re-issued.

FORTRESS PRIVACY POLICY

LAST MODIFIED: MARCH 31, 2022

INTRODUCTION

Fortress Global, Inc and its subsidiaries. ("Fortress", "Us", "We" or "Our") provides this Privacy Policy (the "Policy") to inform you ("You" or "Your") of Our practices regarding the collection, use and disclosure of information We receive when You use the Fortress Mobile Application (the "Fortress App") and all the Fortress Website and Portals ("Fortress Sites") and how We use that information. It is important that You read the Policy along with the Fortress Terms of Service because both apply to Your use of the Fortress App and Fortress Sites.

This Policy may be revised to keep pace with changes in Our products and services and laws applicable to Fortress and You. Fortress reserves the right, at its sole discretion, to update this Policy at any time. If We make material changes to this Policy, then We will notify You by email to the primary email address specified in your account and through a notice on the Website home page. The date this Policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for You, and for periodically visiting our Website and this Policy for any changes. If You do not wish Your information to be subject to the revised Policy, You will need to close Your account. This Policy can be accessed from the settings in the Fortress App, from Our website and in Your Secure Portal. Your use of the Fortress Sites, Fortress App and the Services thereafter constitutes Your agreement to and acceptance of the Policy and its revisions or updates. If You do not agree to be bound by the terms of this Policy and its revisions or updates, You should not use or access the Fortress Sites, Fortress App or Services. You should also periodically read the Policy to learn of any revisions or updates.

INFORMATION PROTECTION

At Fortress, We believe that great privacy rests on great security. We use administrative, technical, and physical safeguards to protect Your information, taking into account the nature of the information and the processing, and the threats posed. We are constantly working to improve on these safeguards to help keep Your information secure. For more information, please see the Security section of this Policy and visit Our Help Section.

YOU HAVE PRIVACY RIGHTS WITH FORTRESS

At Fortress, We respect Your ability to know, access, correct, transfer, restrict the processing of, and delete information relating to You. We have provided these rights to Our global customer base and if You choose to exercise these privacy rights, You have the right not to be treated in a discriminatory way nor to receive a lesser degree of service from Fortress.

Fortress does not sell Your data including as "sale" is defined in Nevada and California. To exercise Your privacy rights and choices, please login to Your Secure Portal. To help protect the security of Your personal data, You must sign into Your account and Your identity will be verified. There may be situations where We cannot grant Your request, for example, if You ask Us to delete Your transaction data and Fortress is legally obligated to keep a record of that transaction to comply with law. We may also decline to grant a request where doing so would undermine Our legitimate use of data for anti-fraud and security purposes, such as when You request deletion of an account that is being investigated for security concerns. Other reasons Your privacy request may be denied are if it jeopardizes the privacy of others, is frivolous or vexatious, or would

be extremely impractical. Further information can be found throughout this Policy including in the section titled "Your Privacy Choices".

If You live in California, if You cannot access Your <u>Secure Portal</u>, You or Your authorized agent can make a request at <u>help@yourfortress.com</u> or by calling (888) 678-9042.

For more information on exercising Your rights, please visit the Help Section of the Fortress website.

INFORMATION WE COLLECT ABOUT YOU

At Fortress, We believe that You can have great products and great privacy. This means that We strive to collect only the information that We need. The information Fortress collects depends on how You interact with Fortress.

A. Fortress Sites

Fortress may collect the following categories of information, some of which You may voluntarily provide, from Your use of the Fortress Sites:

- Contact Information: Data includes Your phone number, address, and email address.
- Cookie and Device Data: Data includes information about Your visit of Our website, IP address, device identifier, browser type and version, operating system and network, location and time zone setting, and other similar tracking technology as further explained below.
- **Event Registration Information**: Data including Identification Information, Contact Information, and other information You provide to us when You access various Fortress content, such as whitepapers, videos, or other research materials.
- **Identification Information:** Data includes Your name, title, job title, and company name.
- Job Applicant Information: Data including Identification Information and Contact Information, resume and other data provided by You or third parties (e.g., recruiters) on Our website in connection with job openings.
- **Third Party Information:** We may also collect these same categories of information through the use of Our third-party marketing and content syndication vendors.

B. Fortress App

Fortress offers multiple tiers within the Fortress App. Each tier offers increased access to Fortress protection, security, insurance and assist features. Information required to provide these services may vary and are listed in this document to help You understand what information We collect directly from You, from Your device and how We use this information. Details regarding product features for the Fortress App for iOS and Android devices can be found on Our <u>website</u>.

Fortress, or Fortress' partners, may collect the following categories of information from You while using the Fortress App:

- Registration Information: To create an account You will need to provide Your name, address, email address and a password.
- **Device Information**: Data such as equipment identifier (e.g., mobile phone number, device type and manufacturer, operating system type and version, wireless carrier/operator, network type, country of origin, Wi-Fi network SSID, Internet Protocol ("IP") address, and the dates and times of Your requests.

- Contact Information: Data such as name, email address, physical address, phone number, or other contact information.
- **Usage Information:** Data about Your activity on and use of Fortress App including product interaction; crash data, performance and other diagnostic data; and other usage data.
- Location Information: Some features We offer work better for You if We can locate Your mobile device. With Your consent, which is provided during initial registration, Fortress may collect location information in two ways. We may receive it directly from Your mobile device, or, in some situations, We may infer location data from cell tower or Wi-Fi hotspot information. We may use third-party service providers to translate that information into usable location information. To prevent location data from being shared go to Your mobile device settings and turn off location services, but in doing so may affect the features that Fortress can provide.
- Fraud Prevention Information: Data used to help identify and prevent fraud including Location
 Data, which is used for example, but not limited to, to verify You are located in the correct country
 for the tier You have selected, and You are located in the correct country in the event that You
 need to claim
- **Transaction Information:** Data about purchases of Fortress products and services or transactions facilitated by Fortress, including purchases through the Fortress App.
- Payment Information: Data including Your credit card number, expiration date, security code
 and other applicable billing information, may be collected directly by Fortress' billing partners if
 You have purchased one of the Fortress tiers using a credit card. We do not store Your Payment
 Data this is collected by PCI compliant and highly reputable credit card processing companies,
 e.g., Stripe. We encourage You to read the Stripe Privacy Policy.
- Application Information: including metadata of all applications installed on Your mobile device (including, but not limited to, the names of the apps and the versions of the apps), and in certain circumstances, We may also collect a copy of part or entire copies of application files on Your device if We encounter an application that We have not previously analysed. This data is pseudonymized and is maintained in aggregate to ensure an individual cannot be identified from other customers. We may also collect information about how applications behave on Your device (e.g., whether an application is sending premium-rate text messages that may charge money to Your phone bill) and the network services with which Your applications communicate. For clarity, Fortress does not collect user data You enter into those applications. As We do not collect any user data You enter into the applications on Your mobile device, Fortress does not collect, read, review, or scan Your emails, or text messages. Fortress does not collect Your photos, or videos, but may scan such files locally on the device to protect You from certain threats that hide inside photo or video files.
- **Web Content Information:** To provide the Safe Site feature, Fortress uses a reputable cybersecurity partner Bitdefender. For this feature to protect You Bitdefender needs to analyse data including URLs and domains for malicious content and content that needs additional analysis to determine if those URLs are unsafe (e.g., if the URLs contain phishing attacks or malware) may be collected directly by Fortress' partner Bitdefender. We encourage You to read the <u>Bitdefender Privacy Policy</u>. If You do not want Our Fortress partner or Us to record the unsafe URLs You visit, You may turn Safe Site off; all other Fortress features will continue to function.
- Other Information You Provide to Us. Details such as the content of Your communications with Fortress, including interactions with customer support and contacts through social media channels.

You are not required to provide the personal data that We have requested. However, if You choose not to do so, in many cases We will not be able to provide You with Our products or services or respond to requests You may have. The following personal data must be provided in order for You to access the Fortress App and Fortress Sites:

- Registration Information: To register, You must provide Your first and last name, Your address, email address, mobile number and Password.
- **Device Information**: You must provide the first eight digits of your devices IMEI number. This is automatically collected on certain devices. You may have to manually enter this number depending on your device.
- Payment Information: Data including Your credit card number, expiration date, security code
 and other applicable billing information, may be collected directly by Fortress' billing partners if
 You have purchased one of the Fortress tiers using a credit card. We do not store Your Payment
 Data this is collected by PCI compliant and highly reputable credit card processing companies,
 e.g., Stripe. We encourage You to read the Stripe Privacy Policy.
- **Other Information:** You must confirm that You are eighteen-years-old or older, and that You agree to the <u>Terms of Service</u>.

INFORMATION ABOUT YOU THAT WE RECEIVE FROM OTHER SOURCES

Fortress may receive information about You from other individuals, from businesses or third parties acting at Your direction, from Our partners who work with Us to provide Our products and services and assist Us in security and fraud prevention, and from other lawful sources.

- **Individuals:** Fortress may collect data about You from other individuals, for example, if that individual has sent You a product, activation code or retail pack, invited You to participate in a Fortress service, or shared content with You.
- **At Your Direction:** You may direct other individuals or third parties to share data with Fortress. For example, You may direct Your Mobile Carrier to share data about Your carrier account with Fortress for account activation, or for Your loyalty program to share information about Your participation so that You can benefit from an offer, reward or feature.
- **Fortress Partners:** We may also validate the information You provide, for example, when creating a Fortress Account, via a third party for security and for fraud-prevention purposes.

For research and development purposes, We may use datasets such as those that contain data that could be associated with an identifiable person. When acquiring such datasets, We do so in accordance with applicable law, including law in the jurisdiction in which the dataset is hosted. When using such datasets for research and development, We do not attempt to reidentify individuals who may appear therein.

HOW WE USE YOUR INFORMATION

A. Fortress Sites

We take Your privacy very seriously and will only use and disclose this information for the business and commercial purposes described in this Policy. How We use Your information will vary depending on the type of data as described below.

- Addressing Customer Inquiries: We use Identification Information, and Contact Information to address customer inquiries so that You may receive a response from us when You contact us.
- Sending Relevant Marketing Messages and Inviting You to Events/Seminars: We use
 Identification Information, Contact Information, Cookie and Device Information, and Event
 Registration Information to communicate with You by way of email alerts and mail to provide You
 with information about product announcements, and special promotions from Fortress or Our
 business partners, to invite You to events that may be of interest to You, or to administer

- participation in surveys, contests etc. You can choose not to receive such marketing communications by clicking on the unsubscribe link in Our emails, as further described below.
- **Improving Our Sites**: We use Cookie and Device Information to improve the functionality and user-friendliness of Fortress Sites. If You fill out a survey or email Fortress for support, We may retain that information in order to provide You with support and to improve the Fortress Sites.
- Keeping the Fortress Sites and IT systems and Processes Safe: We use Identification Information, Contact Information, and Cookie and Device Information to ensure the security and confidentiality of Your data, and to prevent illegal activities, including fraud, which could harm You and Us.
- **Recruitment**: Job Applicant Information is collected and processed for purposes of screening, identifying, and evaluating candidates for positions; and record-keeping related to hiring processes. This processing is necessary in order to take steps at the request of the job applicant in the context of recruitment prior to entering into a contract and may be used as necessary to comply with legal, regulatory, and corporate governance requirements. You may opt out of receiving promotional communications from Fortress by using the unsubscribe link within each email. Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed.

B. Fortress App

When We collect Your information, We store it and associate it with Your account unless otherwise noted. Please note that We need certain types of information so that We can provide the Features and Services to You. If You do not provide Us with such information, or ask Us to delete it, You may no longer be able to access the Features and Services. We take Your privacy very seriously and will only use and disclose this information for the business and commercial purposes described in this Policy. How We use Your information will vary depending on the type of data as described below:

- Registration Data: We may use Your email address to send You information about product
 announcements and special promotions from Fortress or Our business partners. If You email
 Fortress for support, We may retain that information in order to provide You with support and
 to improve Our services. We may use Your email address to communicate with Your device
 about the services, including sending privacy or security related notices and notifying You of
 major Fortress services changes.
- **Device Data:** Automatic scans of Your device may occur periodically to collect details about the applications, devices and operating system files on Your device. Fortress will gather the results of scans performed by Our services and the most current security disposition of the device. In addition, regular updates of threat definitions will be performed. These activities help to protect Your mobile by allowing the Fortress App to detect and address threats on Your mobile device. Where available, Fortress may use client device information to let You know You need to update Your operating system. In addition to using the information You provide to Us and the information We collect from Your mobile device to deliver Fortress services, We also use the information collected from Your device to perform data analytics. These analytics provide important information which helps to improve the features and usability of Our products. We analyse information such as how often You use the Fortress App on Your mobile device, the events that occur within the Fortress App on Your mobile device and where the Fortress App was downloaded onto Your mobile endpoint device. We also use this information in aggregate to perform analysis on known and new mobile threats.
- Contact Information: Back up of your mobile device's address book for the Contacts feature
 occur periodically to maintain an accurate back up of Contact Information so that if in an event

your mobile device goes missing the Contact Information can be transferred onto your new device.

- **Usage Information:** We always strive to make Fortress better therefore we need to understand how You use the Fortress App. The Usage Information helps us ascertain popular features, the circumstances that resulted in a performance or crash issue and increase the features We offer You.
- Location Information: Fortress' Locate, Yell!, Battery Beacon and Location Tracking features
 helps You remotely find Your missing device from Your <u>Secure Portal</u> and Fortress uses the
 Location Information to facilitate these features. If You have activated Battery Beacon, it
 collects location information and sends it back to Fortress when Your battery is running low.
 We save the phone's location to Your <u>Secure Portal</u> at the time We receive the low battery
 alert. Features using the Location Information can be turned on or off via the Fortress App.
- Fraud Prevention Information: This is used to protect You, individuals, employees, and
 Fortress from loss prevention and to prevent fraud. We use Fraud Prevention Information for
 example to reduce the risk of individuals attempting to access the features from an
 unapproved country. make fraudulent claims, abusing the service and putting You, our
 employees, and Fortress at risk,
- Transaction Information: This is used to process, manage and understand the purchases of
 Fortress products and services or activities facilitated by Fortress to deliver the required
 features to You, improvements to the service and maintain the integrity of the offering either
 directly or through a partner of Fortress.
- Payment Information: This is used to enable You to make purchases for Fortress products
 and services that you purchase using a credit card. We do not store any Payment Information
 such as credit card data as we use globally reputable, PCI complaint billing partners such as
 Stripe who directly handle the billing activity. The use of the Payment Information enables
 You, for example to purchase a protection tier from within the Fortress App and receive the
 features contained within that tier.
- Application Data: We use this data to provide the Anti-Virus feature services by conducting
 scans of application files to determine if any applications are behaving maliciously. This
 information is sent to Our cybersecurity partner Bitdefender to analyse and prevent Your
 identity and device integrity being threatened. Data is pseudonymized and aggregated to
 ensure data privacy. We use the record of unsafe applications You try to access to provide
 You with notice that the app You attempted to access/download is unsafe.
- **Web Content Data:** Safe Surfing is a feature designed to identify and warn You of unsafe URLs so that You can choose to avoid loading them. URLs visited are pseudonymized and sent to Our cybersecurity partner Bitdefender to perform security scans. We use the record of unsafe URLs You visit to provide You with notice that the URL You attempted to reach is unsafe.

HOW WE SHARE YOUR INFORMATION

This section describes how Fortress may share and disclose Your information from the Fortress Sites and Fortress App. Fortress may disclose Your information with other members of Our corporate family, or with third parties to provide or improve Our services. For example:

A. Fortress Sites

• Third Party Service Providers and Partners: We may share Your information with third party service providers of products and services integrated with Our Site that need to know Your information for Site improvement purposes. We may share Your information with Our affiliates, resellers or other third-party service providers that are working with Fortress to perform business-

- related functions. We may also disclose Your information to Our third-party partners so they may contact You on Our behalf with relevant marketing messages, which You can choose not to receive by clicking on the unsubscribe link in Our emails.
- Internet-Based Ads: We may provide Your data including the data about Your interests in Our products to third parties for the purposes of serving You more relevant ads about Our products. Where You are provided with interest-based ads on a site other than Our own, We do not track Your other activities on that site. For more information, please see the "Cookies and other Technologies" section below.
- **Cookies:** To collect and analyse information regarding Your usage of Our Site as described in "Cookies and other Technologies" section below.
- To Comply with Law: We may disclose Your information consistent with the law to, for example: (i) comply with a law, regulation, or legal process (including to meet national security or law enforcement requirements); (ii) protect the rights, property, safety or security of any person, entity or facility; (iii) address potential Privacy Policy violations of Our Policy; (iv) investigate fraud, security, or technical issues; or (v) protect Fortress' or a third party's rights or property, Our employees, users and the public. We strongly believe that You have a right to know if We are required by law to disclose Your information. As such, before We disclose Your information in response to a law enforcement request (for example, a subpoena or court order), We will notify You at the email listed in Your account, unless (a) We are prohibited from doing so or (b) in emergency cases where notice could create a risk of injury or death, or the case involves potential harm to minors. Furthermore, nothing in this Policy is meant to limit any legal defences or objections that You may have to a third party, including the government's, request to disclose Your information.
- During a Change to Fortress' Business: We may also disclose Your information to an actual or
 potential buyer (and its agents and advisers) in connection with any actual or proposed purchase,
 merger, or acquisition of any part of Our business, provided that We inform the buyer it must use
 Your personal information only for the purposes disclosed in this Policy. We may also disclose
 your information to a buyer or other successor in the event of restructuring, reorganization,
 dissolution, or other sale or transfer of any part of Our business, whether as a going concern or
 as part of bankruptcy, liquidation, or similar proceeding, in which your Information is among the
 assets transferred.
- **Pseudonymized and Aggregated Data:** For data analysis We pseudonymize, aggregate and summarize data that may include some of Your data.
- With Consent: We may also disclose Your information to third parties when We have Your consent to do so.
- **To Fulfil A Purpose:** We may also disclose Your Information to fulfil the purpose for which you provide it.
- **Other:** We may also disclose Your Information for any other purpose disclosed by us when you provide the Information.

B. Fortress App

- Third Party Service Providers and Partners. We may share Your information with third party
 service providers of products and services integrated with Our software that need to know Your
 information to fulfil Your product or service requests, support Our products and services, analyse
 data for product performance, and product improvement purposes. For example:
 - When using the Anti-Virus and Safe Site feature, Your information is collected by Our cybersecurity partner Bitdefender to provide the service to You. Bitdefender may in turn provide Your data to third parties. We require that Bitdefender and its service providers

- use data collected from You only for purposes of providing services through the Fortress App.
- We may share Your information with Our resellers or other mobile operators to ensure proper delivery of Your purchase and related support services and perform businessrelated functions.
- We may use Your information to conduct market research and engage in joint promotional activities with companies that have products that can add value to Fortress products or services (for example, with mobile operators).
- Third Party Payment Partners. We may allow services providers to collect information directly from You to perform accounting, auditing, billing reconciliation, and collection activities.
- **To Comply with Law**. We may disclose Your information consistent with the law to, for example: (i) comply with a law, regulation, or legal process (including to meet national security or law enforcement requirements); (ii) protect the safety or security of any person, entity or facility; (iii) address potential violations of Our Policy; (iv) investigate fraud, security, or technical issues; or (v) protect Fortress' or a third party's rights or property, Our employees, users and the public. We strongly believe that You have a right to know if We are required by law to disclose Your information. As such, before We disclose Your information in response to a law enforcement request (for example, a subpoena or court order), We will notify You at the email listed in Your account, unless (a) We are prohibited from doing so or (b) in emergency cases where notice could create a risk of injury or death, or the case involves potential harm to minors. Furthermore, nothing in this Policy is meant to limit any legal defences or objections that You may have to a third party, including the government's, request to disclose Your information.
- During a Change to Fortress' Business. We may also disclose Your information to an actual or
 potential buyer (and its agents and advisers) in connection with any actual or proposed purchase,
 merger, or acquisition of any part of Our business, provided that We inform the buyer it must use
 Your information only for the purposes disclosed in this Policy. We may also disclose your
 information to a buyer or other successor in the event of restructuring, reorganization,
 dissolution, or other sale or transfer of any part of Our business, whether as a going concern or
 as part of bankruptcy, liquidation, or similar proceeding, in which Your Information is among the
 assets transferred.
- Pseudonymized and Aggregated Data. For data analysis We pseudonymize, aggregate and summarize data that may include some of Your data. We may share reports resulting from this data analysis publicly, in order to help others, understand mobile threats and gain insights into mobile application behaviour.
- **With Consent**. We may also disclose Your information to third parties when We have Your consent to do so.
- To Fulfil A Purpose: We may also disclose Your Information to fulfil the purpose for which You provide it.
- **Other:** We may also disclose Your Information for any other purpose disclosed by us when You provide the Information.

COOKIES AND OTHER TECHNOLOGIES

Like most providers of online services, the Fortress Sites, online services, interactive applications, email messages, and advertisements may use "cookies" and other technologies such as pixel tags and web beacons.

These technologies help us to better understand user behaviour including for security and fraud prevention purposes, tell us which parts of Our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches.

- **Essential:** These are cookies that enable basic functions and are necessary for the proper function of the Fortress Sites.
- **Statistics:** These are cookies that collect information anonymously. This information helps us to understand how visitors use the Fortress Sites.
- Marketing: These are cookies that are used by third-party advertisers or publishers to display
 personalized ads. They do this by tracking visitors across the Fortress Sites.
- **External Media (Optional):** These cookies are blocked by default. They provide content from video platforms and social media platforms. If External Media cookies are accepted, access to those contents no longer need manual consent.

If You prefer that Fortress does not use cookies, We provide You with the means to disable their use. Certain features of the Fortress Sites may not be available if all cookies are disabled.

In addition to cookies, Fortress uses other technologies that help us achieve similar objectives. In some email messages Fortress sends to You, We provide a "click-through URL" that links You to content on the Fortress website. When You click one of these URLs, they pass through a separate server before arriving at the destination page on Our website. We track this click-through to help us determine interest in particular topics and measure whether We are communicating with You effectively. If You prefer not to be tracked in this way, You should not click graphic or text links in email messages.

Pixel tags enable us to send email messages in a format that You can read, and they tell us whether mail has been opened. We may use this data to reduce or eliminate messages sent to customers.

YOUR PRIVACY CHOICES

A. You Can Access and Update Your Settings

You may update the settings of Your Fortress account via the Fortress App or by logging into Your <u>Secure Portal</u>, to modify certain settings that affect what data is shared with us. To protect Your privacy and security, We require Your username and password in order to verify Your identity before granting You access or making changes to Your account.

B. Email Opt-Outs

You may opt out of receiving promotional communications from Fortress by using the unsubscribe link within each email. Although opt-out requests are usually processed immediately, please allow ten (10) business days for a removal request to be processed. Even after You opt out from receiving promotional messages from us, You will continue to receive transactional and product-related messages from us regarding Fortress Services. You can optout of some of these notification messages in Your account settings.

DATA RETENTION

Fortress will retain Your information, including Your personal data, only as long as reasonably necessary to provide Our products and services to You or as otherwise required for legal compliance purposes.

SECURITY

A. Fortress Responsibilities

Fortress is a mobile protection and security company, and securing Your data is important to us. Fortress uses commercially reasonable physical, managerial, and technical safeguards to ensure appropriate technical and organizational measures appropriate to the risk of processing Your information. For example, We use a combination of firewalls, authentication, physical security, and other safeguards to protect Your account and Your data. When You enter sensitive information (such as Location Data) within the Fortress App We encrypt that information while in transit and at rest using secure socket layer technology (SSL). We also perform third-party penetration tests to harden Our systems from attack. Fortress takes every reasonable effort to implement controls to protect against complex technological threats and other criminal threats, as well as to guard against negligent employees.

No method of transmission over the Internet or method of electronic storage is 100% secure, therefore We cannot ensure or warrant the security of any information, data or content that Fortress receives on Your behalf to operate the Fortress services, or that You transmit to Fortress. All such receipt or transmission of Your information is provided under Your own free will and at Your own risk. We cannot guarantee that such information will not be accessed, disclosed, altered, or destroyed by breach of any of Our physical, technical, or managerial safeguards.

If Fortress learns of a security breach that may affect You, We will attempt to notify You in accordance with applicable law so that You can take appropriate protective steps. Fortress will also post a notice on the Fortress services if a security breach occurs. Depending on where You live, You may have a legal right to receive notice of a security breach in writing.

B. We Are Not Responsible for Content on Third-Party Websites or Services

The Fortress Sites contains links to other websites and Our Fortress App utilises third party services. Fortress does not accept liability for misuse of any information by a third-party provider. We encourage You to read the privacy statements of these linked sites and services, which may differ from ours. In addition, if You take advantage of an offer from one of Our partners, You may be providing information directly to that partner. We encourage You to review the privacy statements of these partners, as We are not responsible for the privacy practices of any partners, linked sites or third-party service provider.

C. Your Responsibilities.

You are responsible for always maintaining the secrecy of Your password. We recommend a strong password that You do not use with other services. If You believe Your password has been compromised, please change Your password immediately via the Fortress website, or contact us at help@yourfortress.com for assistance. You are responsible for ensuring that the email address associated with Your account is accurate. We use that email to contact You about service updates, changes to Our policies, and account activities such as requests for Your information or locate attempts on Your device. Fortress is not responsible for information transmitted to a third party as a result of a user's providing an incorrect email address.

USERS UNDER 16

As Fortress provides services to an international customer base, in order to comply with both U.S. and E.U legal requirements pertaining to both Chapter 91 of Children's Online Privacy Protection Act and Article 8 Conditions Applicable to Child's Consent in relation to information society services of the GDPR Fortress does

not knowingly collect or store any Personal Data about children under the age of 16 unless they are part of a Family Plan purchased by a parent who consents to such collection and storage as described in the Fortress Terms of Service. If You believe a child is using this service without parental consent, please contact us at help@yourfortress.com.

INTERNATIONAL DATA TRANSFERS

If You are a USA resident, then Your Fortress App will connect to the servers in the USA and therefore Your Personal Data will be stored in the USA.

The Fortress App and Fortress Sites form part of global protection, security and insurance product. To make that possible, Your personal data may be transferred to or accessed by entities/employees around the world, for example in the United Kingdom. Fortress complies with laws on the transfer of personal data between countries to help ensure Your data is protected, wherever it may be.

PRIVACY QUESTIONS

If You have questions about the Policy or privacy practices, would like to contact Our Data Protection Officer, or would like to submit a complaint, You can contact Us at help@yourfortress.com or call the Fortress Assist Number as outlined in Your Secure Portal. You can also ask Us questions about how to submit a privacy complaint and We will endeavor to help.

Fortress takes Your privacy questions seriously. Our team will review Your inquiry to determine how best to respond to Your question or concern, including those inquiries received in response to an access or download request. In most cases, all substantive contacts receive a response within seven (7) business days. In other cases, We may require additional information or let You know that We need more time to respond.

Where Your complaint indicates an improvement could be made in Our handling of privacy issues, We will take steps to make such an update at the next reasonable opportunity. If a privacy issue has resulted in a negative impact on You or another person, We will take steps to address that with You or that other person.

If You are not satisfied with Fortress' response, You may refer Your complaint to the applicable regulator. If You ask Us, We will endeavor to provide You with information about relevant complaint avenues which may be applicable to Your circumstances.

When there is a material change to this Privacy Policy, We will post a notice on this website at least a week in advance of doing so and contact You directly about the change if We have Your data on file.

Fortress Global, Inc. 312 Arizona Avenue, Floor 2, Santa Monica, California, 90401, USA.