# SWIMSMART PRIVACY POLICY

This Privacy Policy is designed to help you understand how SwimSmart and its related organizations ("SwimSmart", "we", "us" or "our"), collects, uses and shares personal information collected through this Site. We value your privacy, and we will not share your personal information with third parties except as described in this Policy without your consent.

**BY USING THIS SITE, YOU AGREE TO BE BOUND BY THIS POLICY. IF YOU DO NOT AGREE WITH ANY OF THE TERMS OF THE POLICY, PLEASE DO NOT USE THIS SITE OR PROVIDE US WITH YOUR INFORMATION.**

## What this Policy Covers

This Policy applies to our collection, use and sharing of your personal information (a) when you visit our website at https://swimsmarttech.com/ and its related sites (collectively, the "Site"), including the SwimSmart online portal or application (the "Portal"), (b) when you receive our communications or participate in our activities or events, (c) that we collect via our water safety solutions, and (d) that we obtain from third parties such as customers, content publishers, and suppliers. This Policy applies only to information gathered as described above and does not apply to information collected through any other websites not owned or operated by us or through other means.

## Personal Information We Collect

This section of our Policy describes the categories of personal information we collect about you and the different ways in which we collect your personal information.

- Information You Give Us. Personal information you may provide through the Site or otherwise communicate to us includes:
  - *Contact information*. We collect information about you when you provide contact information to us via email or through the Site. This information may include your name, email address, mailing address, and phone number.
  - *Account Information*. When you register for and use our Portal, you provide us with your contact information, including your first and last name, email address, account name or online identifier, and organization details.
  - *Solution Data*. If you purchase one of our solutions, data collected from our hardware ("Solution Data") may be processed by the Portal. Solution Data may include audio, visual, electronic, thermal, biometric, geolocation, or similar information.
  - *Other information*. We may collect other information from you that is not specifically listed here. We may use such information in accordance with this Policy.
- Information We Get From Others. We may obtain additional information about you from third-party sources, such as your organization, our vendors, social media sites, and advertising agencies to provide you with more relevant information about our services. This information may include your contact information or cookie information.
- Information Automatically Collected. Our servers and third party service providers may automatically record cookie information in connection with your use of the Site, which includes information such as your Internet Protocol (IP) address, device and browser type, operating system, DNS, the pages or features of the Site that you browsed and the time spent on those pages or features, the frequency with which you use the Site, the links that you click on or use, and other statistics. We collect this information in server logs and by using cookies and similar tracking technologies. See our Cookie Policy, below, for more information.

## How We Use Your Personal Information

This section of our Policy describes the different purposes for which we may use the personal information we collect about you.

- To Provide our Products and Services and Communicate With You. We use your contact information and other personal information to: (a) provide you with our products and services; (b) maintain your account; and (c) respond to your requests, questions, comments, and feedback.
- To Improve Our Site. We use your cookie information to: (a) provide, maintain and improve the Site; (b) better understand your needs and interests, and personalize your experience with the Site; and (c) perform analytics and database management services.
- To Send You Marketing Communications. We may use your contact information to send you newsletters, promotions or other marketing communications, but you may opt out of receiving them as described in the Your Choices section below.
- For Compliance, Fraud Prevention and Safety. We may use some or all of your personal information as we believe appropriate to: (a) investigate or prevent violation of the law or your agreements with us; (b) protect our, your or others' rights, privacy, safety or property (including by prosecuting and defending legal claims); (c) protect, investigate and deter against fraudulent, harmful, unauthorized, unethical or illegal activity; (d) comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities; and (e) where permitted by law in connection with a legal investigation. For example, we may share information with law enforcement to reduce the risk of fraud or where someone uses or attempts to use our Site for unlawful purposes.
- With Your Consent. In some cases we may ask for your consent to collect, use or share your personal information.

## How We Share Your Personal Information

This section of our Policy describes the categories of personal information we share with third parties and the types of third parties with whom we share that information. We do not sell your personal information; however we may share your personal information with the following categories of third parties:

- Our Customers. We may share the personal information of individual Portal account holders and Solution Data with our customer organization that have purchased our products and services for uses consistent with their agreement with us.
- Related and Affiliated Organizations. We may share all of the personal information we collect about you with our affiliates and related organizations for use consistent with this Policy.
- Service Providers. We may share your personal information with third party companies and individuals as needed for them to provide us with services that help us with our business activities. This information may include your contact information, account information, Solution Data, and cookie information.
- Compliance, Fraud Prevention and Safety. We may disclose some or all of the personal information we have collected about you as we believe appropriate to government or law enforcement officials or private parties for the purposes described above under the section "For Compliance, Fraud Prevention and Safety."
- Business Transfers. We may sell, transfer or otherwise share some or all of our business or assets, including all of the personal information we have collected about you, in connection with a business deal (or potential business deal) such as a merger, consolidation, acquisition, reorganization or sale of assets, or in the event of bankruptcy.

## How We Retain Your Personal Information

We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirement. When we no longer require your personal information, we will take steps to delete or de-identify it.

## Security

The security of your personal information is important to us. We take a number of organizational, technical and physical measures that are designed to protect the personal information we collect. However, security risk is inherent in all internet and information technologies and we cannot guarantee the absolute security of your personal information.

## Your Rights and Choices

This section describes your rights and choices with respect to the personal information you provide and the communications you may receive. Note that the personal information we may collect about you in connection with Solution Data is controlled by our customers who have purchased a SwimSmart solution. Please contact such customer directly to exercise your rights with respect to any Solution Data.

- Your Rights. You may have the following rights and choices with respect to your personal information:
    - *Access*. You have the right to confirm whether we are processing your personal information and to access such personal information, the third parties with which we share your personal data, and, under certain circumstances, to receive a copy of such personal information.
    - *Correct*. You may request that we correct any inaccurate personal information we maintain about you.
    - *Delete*. You may request that we delete certain personal information we have collected about you, with certain exceptions.
    - *Shine the Light*. Under California's "Shine the Light" law, you have the right to ask us once a year if we have shared your personal information with third parties for direct marketing purposes. We do not engage in this practice.
    - *Opt Out of Communications*. You may opt out of certain notifications by changing the communication preferences in your Portal settings, and you may opt out of marketing emails by using the "unsubscribe" link in the email. To opt out of other forms of communications, please contact us using the contact information provided at the end of this Policy.
- Consequences of Not Providing Personal Information or Deleting Personal Information. You are not required to provide all personal information identified in this Policy to use our Site, but certain functionality will not be available if you do not provide personal information. For example, if you do not provide personal information, we may not be able to provide all of the Site's functionality or respond to your request.
- Exercising Your Rights. To exercise your rights above, please contact us as described at the end of this Policy. As part of your request, please specify which right you are exercising and be prepared to provide your name and contact information. After receiving your request, we will use the information you provided to authenticate your identity or your authority as an authorized agent. However, we may ask you to provide additional information if we cannot

authenticate your identity or authority based on the information you have provided and the information in our records, or inform you if we believe your request is fraudulent. We will not discriminate against you if you choose to exercise your rights. We will respond to your request within the time period required by applicable law and notify you if your request has been granted or declined, or if an exception applies to your request. If we need additional time, we will contact you with the reason and the extension period. We will deliver our written response by mail or electronically, at your option. Our response will also explain the reasons we cannot comply with any request, if applicable. We do not charge a fee to process or respond to your request unless your request is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate prior to completing your request. You have the right to appeal our refusal to take action on a rights request after receiving our decision as detailed in our response or by contacting us as detailed at the end of this Policy. You may also have the right to appeal this refusal to your state's attorney general or other regulatory authority. We will try to inform you of our decision in writing within the time period required by applicable law after receipt of your appeal, with a written explanation of our decision. If we need more time, we will contact you with the reason and the extension period. If your appeal is denied or if you have concerns about the results of an appeal, you may contact your state's attorney general or other regulatory authority. We will provide their contact information with the results of the appeal.

## Cookie Policy

This section of our Policy describes how we and our business partners may collect and store information about you and your use of the Site through cookies and other tracking technologies.

- What are Cookies? Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies set by the site owner are called "first party cookies". Cookies set by other parties are called "third-party cookies". Third-party cookies enable third-party features or functionality, such as website analytics, to be provided on or through the site. The parties that set these cookies can recognize your computer or device both when it visits the website in question and when it visits certain other websites and mobile apps.
- What Cookies and Other Tracking Technologies do We Use? We use several different kinds of cookies on this Site, including strictly necessary cookies, which are cookies that are necessary for the Site to function and cannot be switched off in our systems; performance cookies, which allow us to count visits and traffic sources so we can measure and improve the performance of our Site; and functional cookies, which enable the Site to provide enhanced functionality and personalization. Cookies are not the only way to track visitors to a website. We may use similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Site. These technologies often depend on cookies to function properly.
- Google Services. We use Google Analytics to help us gather statistical information about the visitors to our Site. This information is collected via cookies and other identifiers that we and third parties place on our site. We and our third-party partners may use this information to gain a better understanding of the users of our Site and to improve our products and services. To understand how Google collects and processes data, including through the use of cookies and other technologies, please visit https://policies.google.com/technologies/partner-sites. To opt out of Google Analytics, we encourage you to check out Google Analytics' currently available opt-outs for the web.
- How Can You Disable Cookies and Other Tracking Technology? Depending on the type of browser and device that you use, you may have the ability to control the type of information that these tools use. To do this, follow the instructions in your browser settings. Many browsers

accept cookies by default until you change your settings. For more information about cookies, including how to see what cookies have been set on your computer or mobile device and how to manage and delete them, visit www.allaboutcookies.org and www.youronlinechoices.com.

## International Data Use and Cross-Border Transfers

We are located in the United States, and your personal information may be collected, used and stored in the United States or other countries that do not provide the same level of privacy protection as the laws in your home country. However, we will handle your personal information in accordance with this Policy regardless of where your personal information is kept. Where required by law, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below. Your use of the Site constitutes your consent for the transfer of such data as described in this Policy. If you have questions about cross-border transfers, please contact us as detailed at the end of this Policy.

## Changes to this Policy

We reserve the right to modify this Policy at any time. If we make changes to this Policy, we will post them on the Site and indicate the effective date of the change. If we make material changes to this Policy, we will notify you by email or through the Site.

## How to Contact Us

General Safety Corporation
DBA SwimSmart Corporation
PO Box 152
Marquette, MI 49855
United States of America
Email: support@swimsmarttech.com
Phone: +1-(304)-470-0001
Or click here to contact us.

This Policy was last updated June 4, 2026.