



## PRIVACY POLICY

Welcome to Toovio Software LLC's privacy policy.

Toovio Software LLC respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights as well as how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a PDF version of the policy here:

<https://toovio.com/privacy-policy/>

This Privacy Policy describes Our policies and procedures on the collection, use and disclosure of Your information when You use the Service and tells You about Your privacy rights and how the law protects You.

We use Your Personal data to provide and improve the Service. By using the Service, You agree to the collection and use of information in accordance with this Privacy Policy.

### 1. Interpretation and Definitions

#### 1.1 INTERPRETATION

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

#### 2.1 DEFINITIONS

For the purposes of this Privacy Policy:

- **You** means the individual accessing or using the Service, or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.
- **Company** (referred to as either "the Company", "We", "Us" or "Our" in this Agreement) refers to Toovio LLC, 1330 Lagoon Ave Minneapolis, MN 55408.
- **Affiliate** means an entity that controls, is controlled by or is under common control with a party, where "control" means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.
- **Account** means a unique account created for You to access our Service or parts of our Service.
- **Website** refers to Toovio's website, accessible from <https://www.toovio.com/>
- **Service** refers to the Website.
- **Country** refers to: Minnesota, United States
- **Service Provider** means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used.
- **Third-party Social Media Service** refers to any website or any social network website through which a User can log in or create an account to use the Service.
- **Personal Data** is any information that relates to an identified or identifiable individual.

For the purposes of the CCPA:

- **Personal Data** means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.
- **Cookies** are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.
- **Usage Data** refers to data collected automatically, either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **Do Not Track (DNT)** is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.
- **Business**, for the purpose of the CCPA (California Consumer Privacy Act), refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.
- **Consumer**, for the purpose of the CCPA (California Consumer Privacy Act), means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose, and (2) every individual who is domiciled in the USA who is outside the USA for a temporary or transitory purpose.
- **Sale**, for the purpose of the CCPA (California Consumer Privacy Act), means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's Personal information to another business or a third party for monetary or other valuable consideration.

## 2. Collecting and Using Your Personal Data

### 2.1 TYPES OF DATA COLLECTED

#### PERSONAL DATA

- While using Our Service, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:
  - Email address
  - First name and last name
  - Phone number
  - Usage Data

#### USAGE DATA

- Usage Data is collected automatically when using the Service.
- Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.
- When You access the Service by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.
- We may also collect information that Your browser sends whenever You visit our Service or when You access the Service by or through a mobile device.

### 3. TRACKING TECHNOLOGIES AND COOKIES

We use Cookies and similar tracking technologies to track the activity on Our Service and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyze Our Service.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if

You do not accept Cookies, You may not be able to use some parts of our Service.

Cookies can be “Persistent” or “Session” Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser.

We use both session and persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the Website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices You make when You use the Website, such as remembering your login details or language preference. The purpose of these Cookies is to provide You with a more personal experience and to avoid You having to re-enter your preferences every time You use the Website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to track information about traffic to the Website and how users use the Website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new advertisements, pages, features or new functionality of the Website to see how our users react to them.

For more information about the cookies we use and your choices regarding cookies, please visit our Cookies Policy.

#### 4. USE OF YOUR PERSONAL DATA

The Company may use Personal Data for the following purposes:

**To provide and maintain our Service,** including to monitor the usage of our Service.

**To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.

**For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Service.

**To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.

**To provide You** with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.

**To manage Your requests:** To attend and manage Your requests to Us.

We may share your personal information in the following situations:

**With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to show advertisements to You to help support and maintain Our Service, to contact You, to advertise on third party websites to You after You visited our Service or for payment processing.

**For Business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.

**With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

**With Business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.

**With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

#### 5. RETENTION OF YOUR PERSONAL DATA

The Company will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

The Company will also retain Usage Data for internal analysis purposes. Usage Data is generally retained

for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## **6. TRANSFER OF YOUR PERSONAL DATA**

Your information, including Personal Data, is processed at the Company's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

The Company will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of Your data and other personal information.

## **7. DISCLOSURE OF YOUR PERSONAL DATA**

### **BUSINESS TRANSACTIONS**

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

### **LAW ENFORCEMENT**

Under certain circumstances, the Company may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **OTHER LEGAL REQUIREMENTS**

The Company may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of Users of the Service or the public
- Protect against legal liability

## **8. SECURITY OF YOUR PERSONAL DATA**

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

## 9. DETAILED INFORMATION ON THE PROCESSING OF YOUR PERSONAL DATA

Service Providers have access to Your Personal Data only to perform their tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

### 9.1 ANALYTICS

We may use third-party Service providers to monitor and analyze the use of our Service.

#### Google Analytics

- Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualise and personalise the ads of its own advertising network.
- You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.
- For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

#### Behavioral Remarketing

The Company uses remarketing services to advertise on third party websites to You after You visited our Service. We and Our third-party vendors use cookies to inform, optimize and serve ads based on Your past visits to our Service.

#### Facebook

- Facebook remarketing service is provided by Facebook Inc.
- You can learn more about interest-based advertising from Facebook by visiting this page: <https://www.facebook.com/help/164968693837950>
- To opt-out from Facebook's interest-based ads, follow these instructions from Facebook: <https://www.facebook.com/help/568137493302217>
- Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA <http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada <http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe <http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.
- For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

#### AdRoll

- AdRoll remarketing service is provided by Semantic Sugar, Inc.
- You can opt-out of AdRoll remarketing by visiting this AdRoll Advertising Preferences web page: [http://info.evidon.com/pub\\_info/573?v=1&nt=1&nw=false](http://info.evidon.com/pub_info/573?v=1&nt=1&nw=false)
- For more information on the privacy practices of AdRoll, please visit the AdRoll Privacy Policy web page: <http://www.adroll.com/about/privacy>

## 10. CCPA Privacy

### 10.1 YOUR RIGHTS UNDER THE CCPA

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to access / the right to request.** The CCPA permits You to request and obtain from the Company information regarding the disclosure of Your Personal Data that has been collected in the past 12 months by the Company or its subsidiaries to a third-party for the third party's direct marketing purposes.

- **The right to say no to the sale of Personal Data.** You also have the right to ask the Company not to sell Your Personal Data to third parties. You can submit such a request by visiting our “Do Not Sell My Personal Information” section or web page.
- **The right to know about Your Personal Data.** You have the right to request and obtain from the Company information regarding the disclosure of the following:
  - The categories of Personal Data collected
  - The sources from which the Personal Data was collected
  - The business or commercial purpose for collecting or selling the Personal Data
  - Categories of third parties with whom We share Personal Data
  - The specific pieces of Personal Data we collected about You
- **The right to delete Personal Data.** You also have the right to request the deletion of Your Personal Data that have been collected in the past 12 months.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer’s rights, including by:
  - Denying goods or services to You
  - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
  - Providing a different level or quality of goods or services to You
  - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.

## 10.2 EXERCISING YOUR CCPA DATA PROTECTION RIGHTS

In order to exercise any of Your rights under the CCPA, and if you are a California resident, You can email or call us or visit our “Do Not Sell My Personal Information” section or web page.

The Company will disclose and deliver the required information free of charge within 45 days of receiving Your verifiable request. The time period to provide the required information may be extended once by an additional 45 days when reasonable necessary and with prior notice.

### 10.2.1 DO NOT SELL MY PERSONAL INFORMATION

We do not sell personal information. However, the Service Providers we partner with (for example, our advertising partners) may use technology on the Service that “sells” personal information as defined by the CCPA law.

If you wish to opt out of the use of your personal information for interest-based advertising purposes and these potential sales as defined under CCPA law, you may do so by following the instructions below.

Please note that any opt out is specific to the browser You use. You may need to opt out on every browser that you use.

### 10.2.2 WEBSITE

You can opt out of receiving ads that are personalized as served by our Service Providers by following our instructions presented on the Service:

- From Our “Cookie Consent” notice banner
- Or from Our “CCPA Opt-out” notice banner
- Or from Our “Do Not Sell My Personal Information” notice banner
- Or from Our “Do Not Sell My Personal Information” link

The opt out will place a cookie on Your computer that is unique to the browser You use to opt out. If you change browsers or delete the cookies saved by your browser, you will need to opt out again.

### 10.2.3 MOBILE DEVICES

Your mobile device may give you the ability to opt out of the use of information about the apps you use in order to serve you ads that are targeted to your interests:

- “Opt out of Interest-Based Ads” or “Opt out of Ads Personalization” on Android devices

- “Limit Ad Tracking” on iOS devices. You can also stop the collection of location information from Your mobile device by changing the preferences on your mobile device.

#### **10.2.4 “Do Not Track” Policy as Required by California Online Privacy Protection Act (CalOPPA)**

Our Service does not respond to Do Not Track signals.

However, some third party websites do keep track of Your browsing activities. If You are visiting such websites, You can set Your preferences in Your web browser to inform websites that You do not want to be tracked. You can enable or disable DNT by visiting the preferences or settings page of Your web browser.

### **11. SMS Marketing Program Opt-In and Opt-Out Policy - Effective Date: January 1<sup>st</sup>, 2025**

#### **11.1 Introduction**

We value your privacy and are committed to protecting your personal information. This SMS marketing program Opt-In and Opt-Out Policy describes how we handle marketing text message communications and your rights regarding these communications.

#### **11.2 Opt-In Process**

- The SMS opt-in is separate from email opt-in.
- The customer can text JOIN to (Twilio's approved toll free number)
  - The sample opt-in message that will be received by the customer is: “You consent to receive SMS messages from [Company Name] at the number provided. Message frequency varies. Msg&Data rates may apply. Text STOP to opt-out, HELP for help. See LINK: <https://toovio.com/wp-content/uploads/2025/02/Toovio-Limited-Privacy-Policy-USA.pdf> for more info.”
- Existing Customer Requirement: You must have had at least one in-store purchase in the last 5 years to be eligible.
- Age Requirement: You must be at least 13 years old to provide consent for receiving text messages. If you are under 18, you should have parental or guardian consent.
- SMS Marketing Program Announcement: As an existing customer, you will receive a SMS message announcing the marketing program. This message will explain the benefits of the program and give you an opportunity to opt-in or opt-out.
- Explicit Consent: To subscribe to our SMS service, you must explicitly opt-in by texting a keyword or taking another affirmative action, as specified in our marketing materials or on our website. By opting in, you consent to receive SMS messages related to promotions, news, updates, and services.
- Confirmation Message: Upon opting in, you will receive a confirmation message detailing the purpose of the SMS service and how to opt out. This will be considered a double opt-in.
- Opt-In Process Flow (Figure 1 below):



Double Opt-in Welcome Flow

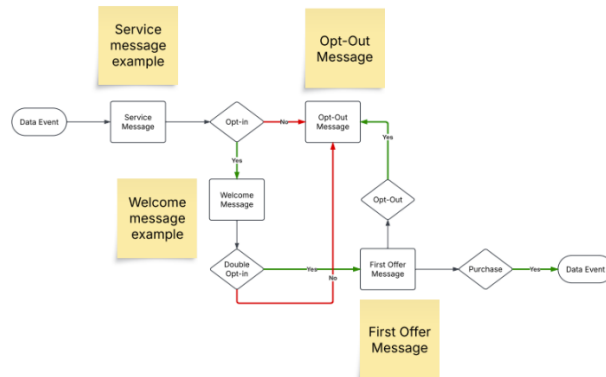


Figure 1

### 11.3 Message Frequency & Relevancy

- Frequency Notification: We will inform you of the expected frequency of messages at the time of opt-in. Messages might be sent for various purposes including but not limited to sales, account information, or customer service.
- Message Relevancy: These marketing messages are personalized to your purchasing behavior. This ensures these messages are highly relevant to you, your gear and your success in your hunting and outdoor activities.

### 11.4 Opt-Out Process

- Easy Opt-Out: You can opt out of receiving text messages at any time by replying with "STOP" or any similar keyword indicated in the messages you receive. Please see the following example flow below for opting out when receiving a marketing offer (Figure 2 below):

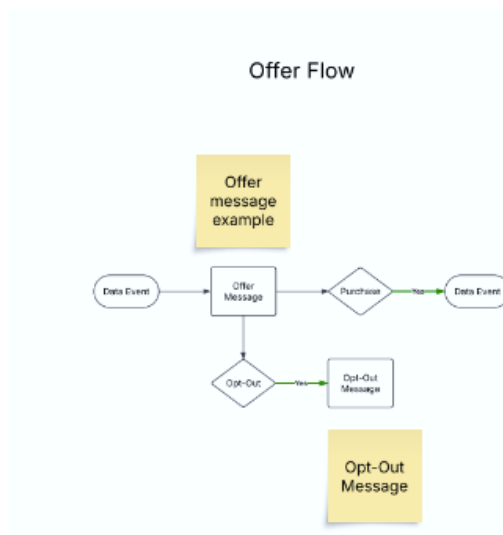


Figure 2

- Confirmation: Once you opt out, you will receive a confirmation text message acknowledging your request to no longer receive SMS communications from us.
- Re-opting In: If you've opted out but later decide to receive texts again, you can opt back in by texting a keyword or following instructions provided in our communications.

### **11.5 Opt-in Information Saved**

- The following information will be saved by Toovio when you opt-in or opt-out:
  - Phone number – your mobile number
  - Name – Your first and last name
  - Message – The SMS message that was sent to you
  - Response – Your SMS response to the message above
  - Timestamp – the date/time stamp when the response was received
  - Session – Session ID
  - Opt-in – Yes/No – Did you opt-in?
  - Opt-out – Yes/No – Did you opt-in?

### **11.6 Costs**

- Message and Data Rates: Standard message and data rates may apply based on your carrier plan. We do not charge for the SMS service, but your mobile service provider might.

### **11.7 Privacy**

- Data Protection: Your phone number and any personal information provided will be handled as per our Privacy Policy
- Third-Party Services: We might use third-party services to send messages. We ensure these services follow our privacy standards.

## **12. Children's Privacy**

Our Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If You are a parent or guardian and You are aware that Your child has provided Us with Personal Data, please contact Us. If We become aware that We have collected Personal Data from anyone under the age of 13 without verification of parental consent, We take steps to remove that information from Our servers.

We also may limit how We collect, use, and store some of the information of Users between 13 and 18 years old. In some cases, this means We will be unable to provide certain functionality of the Service to these users.

If We need to rely on consent as a legal basis for processing Your information and Your country requires consent from a parent, We may require Your parent's consent before We collect and use that information.

## **13. Links to Other Websites**

Our Service may contain links to other websites that are not operated by Us. If You click on a third-party link, You will be directed to that third party's site. We strongly advise You to review the Privacy Policy of every site You visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

## **14. Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. We will notify You of any changes by posting the new Privacy Policy on this page.

We will let You know via email and/or a prominent notice on Our Service, prior to the change becoming effective and update the “Last updated” date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.