

RightPlug Alliance, Inc. (“RightPlug Alliance”), seeks to ensure that, to the greatest extent practicable, the RightPlug Standard, or products based thereon, is/are not used in any manner to violate an individual’s right to privacy.

The purpose of this privacy policy (“Policy”) is to provide clear rules regarding the rights and obligations of all Members regarding privacy of personal information in order to promote the ongoing development, adoption and widest possible deployment of the RightPlug Standard and compliant products.

Agreement with, and continued compliance with, the provisions of this Policy, as may be amended from time to time, is a condition to membership in RightPlug Alliance.

1. Definitions

“**Member**” means any member, or group of members, or representative or representatives thereof, collectively or individually as applicable, of RightPlug Alliance.

“**Individual**” means any natural person.

“**UID**” means the unique identifier stored within each encoded tag and encoded plug in accordance with the RightPlug Standard.

“**Encoded Information**” means any information stored within an encoding tag or encoded plug complying with the RightPlug Standard.

“**Personally Identifiable Information**” means any Encoded Information that may be linked to any individual. Without limitation, any Encoded Information that includes the UID, or information derived therefrom, is Personally Identifiable Information.

“**Aggregate Information**” means any information derived from Encoded Information of more than one source that cannot be linked to any individual by any means. Without limitation, Aggregate Information shall not incorporate the UID or information derived therefrom.

“**Anonymous Information**” means any Encoded Information, or information derived from Encoded Information, that cannot be linked to an individual or individuals by any means. Without limitation, Anonymous Information shall not incorporate the UID or information derived therefrom.

“**Anonymize**” means to modify Personally Identifiable Information and any information derived therefrom, as necessary to convert it to Anonymous Information.

2. Prior Consent

Member agrees to refrain from collecting, using, or disseminating Personally Identifiable Information, through any means, without prior permission from all Individuals related to said Personally Identifiable Information, for such information to be gathered and used for specific and limited purposes. The collection of Personally Identifiable Information should be limited to that which is necessary for the specified purpose.

3. Privacy and Security of Personally Identifiable Information

Member agrees to put in place appropriate physical, electronic, and managerial procedures to safeguard and secure Personally Identifiable Information.

4. Retention of Personally Identifiable Information

Member agrees to destroy, erase or anonymize all Personally Identifiable Information, when it is no longer needed to fulfill the specific and limited purposes for which it was gathered.

5. Deletion of Personally Identifiable Information

Member agrees to, upon receipt of written request from an Individual, destroy, erase or anonymize all Personally Identifiable Information linkable to said Individual.

6. Use of Aggregate Information

Member does not have any obligations regarding the collection, use, or dissemination of Aggregate Information or Anonymous Information.

7. Survival

All terms of this policy shall survive termination, cancellation or expiration of membership of any Member.