



Privacy Policy

Effective Date: January 1, 2023

This Privacy Policy covers Westnet, Inc.'s ("Westnet," "we," "us," "our") policies on the collection, use, and disclosure of personal information and data (as defined by applicable law, including, but not limited to, the California Consumer Privacy Act of 2018, Civil Code sections 1798.100 et seq ("CCPA") and the Virginia Consumer Data Protection Act of 2021, as amended, VA Code Title 59.1 a chapter numbered 52, consisting of sections numbered 59.1-571 through 59.1-581 ("VCDPA") (collectively referred to as "Personal Information") when Authorized Users of Westnet's customers access the First-In Mobile Application ("First-In Mobile App") and the software and services made available through the First-In Mobile App (collectively the "Services").

1. Information Collected by Westnet

Categories of Personal Information. Email address, Authorized User Name, Authorized User's Assigned Fire Department/Agency, Geolocation, Event Response Data

- **Account Creation Information:** When logging in to access the First-In Mobile App, Authorized Users must provide their email address. The collection of this information is necessary to authenticate Authorized Users and to enable access to the First-In Mobile App. Authorized Users' email may also be utilized to (i) provide notifications as part of the Services; and/or (ii) to communicate material changes to our Terms of Service and Privacy Policy.
- **Profile Creation:** Once authenticated, Authorized Users can establish a profile to include their full name, state, and fire department or agency in which Authorized User is employed or volunteers. This information is needed to provide the First-In Mobile App and Services, to facilitate communication between Authorized Users, provide relevant emergency response notifications, geolocation coordination and facilitate response to emergency events.
- **Geolocation.** An Authorized User's location is tracked by the First-In Mobile App as an integral part of the Services to facilitate relevant emergency response notifications, geolocation coordination between Authorized Users and enable Fire Department/Agencies to allocate resources based on Authorized Users relevant location.
- **Event Response Data:** The First-In Mobile App enables Authorized Users to input information relating to an emergency event response. This information is added in optionally by Authorized Users, but may include input of Personal Information of persons requiring emergency assistance by Fire Departments/Agencies. Such optional information is input by Authorized Users to facilitate and coordinate emergency responses.

2. Personal Information Processed and Disclosed by Westnet

PERSONAL INFORMATION IS PROCESSED BY CERTAIN SERVICE PROVIDERS FOR PURPOSES OF PROVIDING FIRST-IN MOBILE APP SERVICES AS FOLLOWS:

Web Hosting Services: The First-In Mobile App and Personal Information collected is encrypted in transit and in storage on cloud servers maintained by Microsoft Azure and AWS. Please see [Microsoft Azure Privacy Statement](#) and [AWS Data Privacy Compliance Statement](#) for more information on their privacy and security practices.

SendGrid Email API. Westnet has integrated SendGrid Email API. SendGrid is a cloud-based SMTP provider that allows Westnet to send notifications to its Authorized Users without having to maintain email servers. Use of the API serves Westnet's legitimate interests in communicating with Authorized Users to facilitate the First-In Mobile App Services. For more information, please see the [SendGrid Privacy Policy](#).

Geolocation Data: Westnet has integrated the Google API to incorporate Google Maps and to utilize geolocation in connection with the Services. For more information on the privacy policy of this service, please see: [Google's Privacy Policy](#).

Other Potential Disclosures: Personal Information may be disclosed to third parties to serve our legitimate business interests as follows: (a) as required by law, such as to comply with a subpoena, or similar legal process, (b) if Westnet is involved in a merger, acquisition, or sale of all or a portion of its assets, (c) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (d) enforce our agreements with you, and/or (e) investigate and defend ourselves against any third-party claims or allegations. We will use commercially reasonable efforts to notify Authorized Users about law enforcement or court ordered requests for data unless otherwise prohibited by law.

3. Personal Information of Minors

Only persons ages 18 or older are authorized to register access to the First-In Mobile App. Westnet does not knowingly collect Personal Information from anyone under the age of 18. If a parent or guardian becomes aware that his or her child under the age of 16 has provided with Personal Information without their consent, he or she should contact Westnet at privacy@westnet-inc.com. Westnet will delete such Personal Information from our files within a commercially reasonable time, but no later than required under the applicable law.

4. Retention and Deletion of Personal Information; De-Identified Data

Unless erasure is otherwise requested by a customer or Authorized User, Westnet will retain Personal Information no longer than reasonably necessary to provide our Services to Authorized Users or as otherwise required pursuant to the data retention policies of our customer. Anonymized and de-identified data will be retained as long as Westnet determines such data is commercially necessary for its legitimate business interests.

To the extent Westnet de-identifies any Personal Information, Westnet shall maintain and use such de-identified data without attempting to re-identify the data.

5. Westnet's Security Practices.

We have implemented reasonable administrative, technical and physical security measures to protect Personal Information against unauthorized access, destruction or alteration. However, although we endeavor

to provide reasonable security for Personal Information we process and maintain, no security system can ever be 100% secure.

6. First-In Mobile App’s Response To “Do Not Track” Signals

“Do Not Track” is a feature enabled on some browsers that sends a signal to request that a website disable its tracking or cross-site user tracking. First-In Mobile App does not engage in cross-site user tracking and thus its mobile application does not respond to such signals.

7. Changes to this Privacy Policy

If we make material changes to our Privacy Policy, we will notify you by (1) changing the Effective Date at the top of the Privacy Policy, or (ii) sending an electronic notification to all active account holders, *or* (iii) adding a banner/notification to the First-In Mobile App itself.

8. Supplemental U.S. State-Specific Notices

This supplemental notice applies to you only if you are a resident of California or Virginia. Such consumer privacy notices and rights shall also apply to other state residents to the extent other state consumer privacy laws are implemented following the last date this Privacy Policy was last updated.

Westnet collects, uses and/or discloses Personal Information as follows:

Personal Information Collected, Used and/or Disclosed in Preceding 12 Months				
Category of Personal Information Collected	Categories of Source of Collection	Purpose of Use	Categories to Whom Westnet Discloses Personal Information	Purpose of Disclosure
<u>Identifiers & Personal Information</u> <ul style="list-style-type: none"> Name/Alias 	YOU	<ul style="list-style-type: none"> Performing Services 	<ul style="list-style-type: none"> Authorized Users Westnet Customer - Fire Department 	<ul style="list-style-type: none"> Performing Services – facilitate communication amongst Fire Departments & Authorized Users
<ul style="list-style-type: none"> Email 	YOU	<ul style="list-style-type: none"> Performing Services Data Security/Account Verification 	N/A	N/A
<ul style="list-style-type: none"> Address 	YOU	<ul style="list-style-type: none"> Performing Services: Account Registration/Profile 	N/A	N/A

<ul style="list-style-type: none"> Cell or Telephone # 	YOU	<ul style="list-style-type: none"> Performing Services: Account Registration/Profile 	<ul style="list-style-type: none"> Westnet Customer – Fire Department 	<ul style="list-style-type: none"> Performing Services – facilitate On-Duty response between Customer Fire Departments & Authorized Users
<ul style="list-style-type: none"> Unique/Online ID (cookies) 	DEVICE	<ul style="list-style-type: none"> Analytics Auditing Data Security Maintaining Services 	Service Provider	<ul style="list-style-type: none"> Analytics Auditing Data Security Maintaining Services
<u>Precise Geolocation Data</u>	DEVICE	<ul style="list-style-type: none"> Performing Services Only: On Duty tracking to facilitate emergency call response 	Westnet Customer – Fire Department Dispatch; Fire Departments; Authorized Users	Performing Services - Facilitate emergency call response between Customer Fire Department and Authorized Users

Other Potential Third Party Disclosures: Personal Information may also be disclosed to serve our legitimate business interests as follows: (a) as required by law, such as to comply with a subpoena, or similar legal process, (b) as part of a merger, acquisition, bankruptcy or other transaction in which a third party assumes control of all or part of the business, (c) to investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies as required by law; (d) enforce our agreements with you, and/or (e) investigate and defend ourselves against any third-party claims or allegations.

A. Sale of Personal Information; Sharing of Personal Information

Westnet does not and will not sell your Personal Information.

Westnet does not share Personal Information with third parties for cross-context behavioral advertising purposes.

B. Consumer Rights. Consumers may contact Westnet to exercise the following consumer rights:

1. Request Westnet Disclose At No Charge:

- Specific pieces of personal information it has collected about you;
- categories of Personal Information collected, used, and/or disclosed about you;
- categories of sources from which Personal Information is collected;
- business and/or commercial purposes for collecting and disclosing your Personal Information;
- categories of third parties with whom your Personal Information has been disclosed/shared; and

Right to Know Requests can be submitted to Westnet by email at privacy@westnet-inc.com.

2. Request Westnet to Delete At No Charge:

Deletion Requests can be submitted to Westnet by email at privacy@Westnet.com or by mail to Westnet at: Westnet, Inc., Attention: Privacy Request to Delete, 15542 Chemical Ln, Huntington Beach, CA 92649 or by email at: privacy@westnet-inc.com.

C. Request Westnet Correct At No Charge:

Requests that Westnet correct any inaccurate Personal Information collected by Westnet can be submitted by email to privacy@westnet-inc.com

D. Limit Use of Sensitive Personal Information

Westnet collects precise geolocation information of an Authorized User which enables the application to identify the location of an Authorized User within a 1750 feet radius. This precise geolocation information is necessary to facilitate emergency call responses between the Westnet Customer Fire Department and Authorized Users. Westnet does not use an Authorized User's precise geolocation for any other purpose except to provide the First-In Mobile Application services.

Because precise geolocation is necessary to perform the required services and is not used for any other purpose, such use is statutorily permitted and requests to limit an Authorized User's precise geolocation information cannot be accommodated.

Authorized Users can terminate their account and request deletion of their Personal Information at any time.

E. Verified Request Process

Westnet will verify all consumer requests prior to taking any action in response to such request. For consumers that maintain an account with WESTNET, it may verify the identity of the consumer making the request by either matching information with the account information on file or through existing account authentication credentials.

Under applicable state law, you may exercise these rights yourself or you may designate an authorized agent to make these requests on your behalf. Authorized agents must demonstrate they have written authorization from you to make requests on your behalf. Westnet may additionally require the consumer to confirm their identity and verify the authorized agent's permission before complying with any request.

F. Consumer Request Limitations

Please note that these rights are not absolute and in certain cases are subject to conditions or limitations as specified in the applicable state laws, including, but not limited to:

- Westnet is obligated to disclose/delete only upon a **verifiable** Consumer request from the consumer or an authorized agent acting on behalf of Consumer.
- Consumers may only make a personal information request twice in a 12-month period.

- Deletion is not required if it is necessary for Westnet to maintain the Personal Information to fulfill applicable permissible purposes enumerated pursuant to applicable state consumer privacy laws.

Westnet will confirm and respond to all requests within the timeframe required under applicable state law. In responding to any request to disclose/delete, Westnet shall maintain a record of the requests as required under applicable state law.

G. Non-Discrimination Policy

You have the right not to receive discriminatory treatment for exercising any rights conferred by the CCPA and VCDPA. Westnet shall not discriminate against a consumer for exercising any statutory consumer privacy rights, including, but not limited to, (a) denying goods or services, (b) charging different prices or rates (including discounts/penalties) that is not directly related to the value provided to Westnet for the Personal Information, (c) suggesting Consumer will receive a different rate/price or different level of quality of goods/services, or (d) providing a different level of quality of goods/ services.

H. Your Virginia Privacy Rights under VCDPA

If Westnet is unable to process requests relating to your Personal Information and denies your request, Virginia residents have the right to appeal by emailing Westnet at privacy@westnet-inc.com. Westnet will respond to your appeal request within 60 days of receiving the request to appeal.

I. Your California Privacy Rights under California Civil Code Section 1798.83 & Business and Professions Code Section 22581

California law permits Consumers to request and obtain from Westnet once a year, free of charge, certain information about their Personally Identifiable Information (“PII”) (as defined by California law) disclosed to third parties for direct marketing purposes in the preceding calendar year (if any). If applicable, this information would include a list of the categories of PII that was shared and the names and addresses of all third parties with which we shared information in the immediately preceding calendar year.

In addition, a business subject to California Business and Professions Code Section 22581 must allow California residents under age 18 who are registered users of online sites, services or applications to request and obtain removal of content or information they have publicly posted. Your request should include a detailed description of the specific content or information to be removed. Please be aware that your request does not guarantee complete or comprehensive removal of content or information posted online and that the law may not permit or require removal in certain circumstances.

J. Accessibility of this Policy.

- You can download and print a copy of this Notice [here](#)

K. Contact Us

If you have any questions regarding your Personal Information or about our privacy practices, please contact us at: Westnet, Inc., Attention: Privacy Department, 15542 Chemical Ln, Huntington Beach, CA 92649 or by email at: privacy@westnet-inc.com.

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