

Privacy Policy

Last Updated: _____, 2024

We invite you to read this privacy policy (“Privacy Policy”), which explains our privacy practices and how we handle your personal information collected offline and online, including through websites, social media, our marketing activities, our live events, our Services, equipment, devices, mobile applications, and other activities described in this Privacy Policy. This Privacy Policy also explains how we use and disclose such information and choices you have about your personal information.

We offer several services, including, monitoring, ignition interlock, portable alcohol testing and related products and services, websites, mobile apps, as well as equipment, hardware and software (collectively, “Services”). This Privacy Policy applies to all of our Services in the United States where this Privacy Policy appears or is referenced. By accessing the Services, you confirm that you have read, understand, and acknowledge the terms of this Privacy Policy. Roadguard Interlock, LLC (“we” or “our” or “us”) acts as a controller for purposes of this Privacy Policy.

Contents of this Privacy Policy

1. [Personal Information We Collect](#)
2. [Sources of Personal Information We Collect](#)
3. [How We Use Your Personal Information?](#)
4. [We Share Your Personal Information with Others](#)
5. [What Are My Privacy Choices?](#)
6. [How Long Is My Personal Information Kept?](#)
7. [Personal Information Processed in the United States.](#)
8. [How Is My Personal Information Protected?](#)
9. [Personal Information Relating to Children.](#)
10. [Changes to this Privacy Policy.](#)
11. [How to Contact Us.](#)
12. [California-Specific Disclosures.](#)

1. Personal Information We Collect.

We (and the vendors that perform services on our behalf and other parties) collect, receive, and develop several categories of personal information about you depending on the nature of your interactions with us. We may collect personal information about you from you directly or other users of our Services, through technology that passively collects information from your browser or device, and from third party sources.

- **Identifiers and Contact information.** When you inquire about our Services, interact with a service center or call center, make an appointment, sign up for an account, or sign an agreement to use our products and Services, you will need to provide certain information about yourself, such as your name, email address, phone number, physical address, and zip code. If you create an account, we also collect your username and password, and you may also choose to provide other personal details in your account or through our Services, including information about your business, family, members of your household or others. We may also collect certain information about your vehicle, including your license plate number, vehicle make, model, year, and identification number.
- **Adjudication or Administrative Process-related information.** We may collect information relating to your adjudication or administrative process including location of citation, blood alcohol content associated with the citation, DUI history, incident data, and court date information. We may also collect information from court orders, revocation notices, and mechanics’ affidavits. We may also collect information relating to your criminal history. We may also collect alcohol monitoring requirements, including device requirements, monitoring authority, and install by date.
- **Protected Classifications/Demographic information.** We may collect demographic information, such as your age, date of birth, or gender.
- **Customer records.** We may collect your signature, social security number, physical characteristics or description, address, telephone numbers, driver’s license or state identification card number and issuing state,

vehicle insurance policy number, certain government records, certain court information, education, employment, employment history, financial information, or medical information you submit, or we otherwise obtain, in connection with the Services. We also collect alcohol monitoring data from monitoring devices as well as installation, maintenance, and usage information relating to monitoring devices.

- **Employment-Related Information and Education information.** If you apply for a job, we may collect information about your work experience and previous employment, your education history, your resume, the URL to your personal or professional websites, your workplace skill sets and certifications, whether you need a visa to work in the United States, and salary expectations. If you apply for a job, you can choose to also voluntarily provide any of the following information: ethnicity, gender, disability status, and/or veteran status. We and our vendors will collect employment related information provided by or on your behalf in connection with the Services.
- **Payment and Financial information.** If you make a payment either to or through us, then you are providing our payment processors with your payment card details and other payment information in order to complete the transaction, which may include your account number, credit card number, expiration date, card verification number, and billing address.
- **Visual/Audio/Sensory information.** We may record audio during customer service and sales calls. We also collect audio or visual information, such as photographs, audio (including voice recordings), videos and facial detection in connection with the use of our Services. Certain data may include personal information of other people, such as a photo taken as part of the monitoring services may include other people in the background. We also collect sensory information you submit in connection with certain of our Services, such as the results of a breath test, heart rate, and body temperature.
- **Survey data.** We may contact you to request participation in a survey or other general research. If you choose to take part in these, you may provide personal information, in or along with your survey responses.
- **Promotions-related information.** If you take part in a promotion or rebate, you may provide personal information, feedback, or comments.
- **Communications with us.** We collect the communication you send to us, such as your feedback, comments, requests and suggestions.
- **Location/Geolocation information.** We collect information about your location and the location of those traveling with you that are submitted to or captured by our Services. We also collect the location of our devices, which may include your precise location while you use or are otherwise near the device.
- **Sensitive Personal information.** We may collect your sensitive personal information such as Social Security number, driver's license number or state identification number; precise geolocation data; biometric information; health related data such as heart rate and body temperature; and username and password for the purposes described in this Privacy Policy.
- **We collect information you submit, provide, or post.**
- **We collect and develop Inferences.** Using the other pieces of personal information collected about you, we draw inferences about you, reflecting what we believe to be your behaviors, characteristics, predispositions, and abilities.

We, our service providers, and partners collect technical information when you visit or use our Services, engage with our partners, or interact with our or our partners' marketing communications, including:

- **Our Devices and Services data.** We collect information about our products and their uses, including user logs, attempts to bypass or disable devices, performance, and technical issues.
- **Technical and Network Activity information.** This data may include your device's manufacturer and model, operating system and version, internet connection, screen resolution, RAM and disk size, CPU usage, IP address, browser type, telephone number, unique identifiers (including identifiers used for advertising purposes), crash data (if applicable), metadata or other files stored on your device, what device settings you've enabled, carrier, radio/network information (e.g., WiFi, LTE, 5G). Your device and software settings affect what information your device makes available to us.
- **Online activity data.** Online activity data may include the date and time you visited our website, traffic data, logs, duration of access to our site or apps, the browser or app version you used (and its settings) in connection with our Services, resources that you access and use on or through our websites or apps, the URLs you come from and go to, and how you interacted on the website, with our emails, ads, content and other messages. We may collect and record page interaction information and other electronic communications and content from your use of our Services, including content entry, mouse movements, online chats, screen captures, the search

terms and other data you enter, and methods used to navigate away from the page. Online activity data may include how and when you navigated within the website, and which links or features you clicked on. We may do this by embedding tags, pixels, web beacons or other trackers in the content. We may engage or allow other parties to also collect information on our Services and devices in these ways. If you use our mobile apps, we may also look at how often you use the app and where you downloaded it.

2. Sources of Personal Information We Collect.

In addition to the personal information we collect from you, we may also collect personal information about you from several sources (such as companies we partner with or that provide services to us) and public sources. For example:

- **You and the devices you interact with** provide information about you as described in more detail above and in this Privacy Policy.
- **Our family of companies** may provide your personal information to us. This includes our parent, subsidiaries, and affiliates.
- **Vendors and partners** provide information about you for advertising, analytics, personalization, and measurement purposes.
- **Advertisers** provide us with information about their users or potential customers to help us personalize advertising and measure the performance of their advertisements.
- **Monitoring Authorities** make your information available for public access as part of your adjudication or administrative process, including criminal or civil case information, or they provide us with information about you associated with your requirement to use our products and Services.
- **Government agencies** such as the DMV may provide us information in connection with complying with legal obligations and to validate information we have about you.
- **Attorneys and others who provide information on your behalf, such as a parent or other relative or guardian**, provide us with information about you when they refer you to us.
- **Other parties provide us with information about you**, such as business and marketing partners and social media platforms that give us information they have collected either directly or indirectly from you. For example, we may receive information from advertising networks and data analytics providers. We may also receive personal information from your employer, background check providers, and record verification providers. We may also receive employment related data from a job network or social network if you choose to import your information from those platforms when applying for a job with us.
- **Court orders, revocation notices, general correspondence, and mechanics' affidavits.**
- We **combine information** that we have collected offline with information we collect online. Or we may combine information we get from another party with information we already have.

3. How We Use Your Personal Information.

We use personal information for our business and commercial purposes, including for the following purposes:

3.1 Create and administer your account.

We use personal information to populate your account, personalize your website and app experience, and give you notices about your account, including expiration and renewal notices.

3.2 Provide, develop, and improve our Services.

We may use your personal information to provide and improve our Services, including to:

- Provide our Services to you, including reporting your compliance and noncompliance with your monitoring authority's requirements.
- Operate our website and app and improve our products and features.
- Obtain feedback, for example by conducting surveys.
- Administer sweepstakes, contests, or other promotional activities.
- Highlight businesses, ads, offers, products, and services you may be interested in.
- Personalize your experience of the website and app.
- Understand trends, usage statistics, and demographic data relating to you.
- Respond to your support requests and comments.

- Improve our Services and develop new Services.
- Test and evaluate potential new products and features on the website.
- Assess, diagnose and resolve problems, and monitor usage and resource needs.
- Accept payments, through our third party payment processors.
- Communicate with you about our website, our apps, the devices and other Services, including by sending announcements, updates and changes to devices products, promotions, other marketing messages, security alerts, support messages via email, notifications, text messages.

3.3 Create and maintain a trusted environment.

We may use your information to help create and maintain a trusted environment on the website and with our other Services and products, including:

- To detect and prevent fraud, spam, abuse, tampering, circumvention, security incidents, and other harmful, unauthorized, unethical, illegal, or otherwise objectionable activity or content.
- To conduct security investigations, audits, and risk assessments.
- To confirm or authenticate information or identification or compliance with monitoring authorities' requirements.
- We use your personal information to verify and respond to requests made pursuant to this Privacy Policy and for other verification purposes.

3.4 Advertising.

We use personal information to provide advertisements and marketing, including:

- To help personalize advertisements based on what we think may interest you.
- To provide and measure the effectiveness of personalized advertising, including whether it is interesting to you and effective for the advertiser.
- To improve the personalization of advertisements.
- To send you promotional messages, marketing, advertising, and other information that we think may interest you.
- To invite you to participate in events or other relevant opportunities.

3.5 Research and development.

We use personal information for research and development purposes. As part of these activities, we may generate aggregated, de-identified and/or other anonymous data from personal information we collect. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve our Services, develop new products and services, and promote ourselves.

3.6 Employment.

We use information for hiring purposes. For example, we use personal information to review your job applications and contact you about employment opportunities.

3.7 Legal Compliance.

We may use your personal information to comply with our legal obligations, including those imposed on us by law, regulation, rule, or contract, including:

- For legal and safety reasons, including as described in Section 4 below.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.

3.8 As Permitted by Law.

We use your personal information as otherwise permitted or required by law or as we may notify you from time to time.

4. We Share Your Personal Information with Others.

We disclose personal information with others, including as follows:

4.1 Government, law enforcement, monitoring authorities, and similar parties.

We will share information with your monitoring authority and/or probation officer as required by the terms of your monitoring obligations, or as required by applicable law, rule or regulation. We also share information with state agencies, including Departments of Motor Vehicles, as may be required by applicable law, rule, or regulation. We may also disclose your personal information with law enforcement, government authorities, and private parties to: (a) respond, as required by applicable law, to a legal request (e.g., a subpoena, a search warrant, court order, or other legal process from government or law enforcement); (b) detect, investigate, prevent, and address fraud and other unauthorized, illegal or unethical activity, security, or technical issues; (c) protect our or others' rights, property, or safety; (d) enforce any agreements we have; (e) prevent physical injury or other harm to any person or entity, including you and members of the general public.

4.2 Business partners, social media platforms, advertising partners, and marketing companies

If you view, click on, or reply to an advertisement or other offer on our Services, we may share your reply, information you provide, and information associated with your interaction with the advertisement or offer, both of which may contain personal information, with the advertiser, our business partners, and marketing companies. Additionally, we may log and share your interaction with online advertisements, for example as part of tracking the effectiveness of the advertisement. We may also pre-populate replies to ads you click on with your contact details.

Our Services may be supported by advertising, including third party advertising networks. We and our advertising partners use cookies and other technologies to collect information about you and your devices over time across and other online services. Where permissible according to applicable law, we may also share certain personal information, such as hashed emails and advertising identifiers, with our advertising partners that help serve targeted online advertising to you or to similar audiences. Our advertising partners may be able to associate this information with you based on your advertising identifiers or other personal information they have about you. Our advertising partners may then use the information they collect to provide you with personalized ads on Roadguard Interlock as well as on different websites and services, and to measure the effectiveness of the ads.

Our Services include certain social media features, including a social media share button. If you choose to share content with personal information using this button, information about that content will be disclosed to the selected social media website.

4.3 Distributors and other partners.

We may partner with other parties with whom you would like to disclose information. When you engage with one of these partners, you might direct us to disclose additional information directly with the partner. For example, we may have contracted with distributors and authorized service providers to provide monitoring services, ignition interlock services, portable alcohol testing services, equipment, and other related services and products. In such cases, when you inquire about our Services, we will share the information you provide about yourself, such as your name, email address, phone number, and physical address, with these parties.

4.4 Service providers.

We disclose your personal information with vendors and service providers who perform services on our behalf. For example, we may also disclose personal information to them to help us operate, provide, improve, understand, customize, support, and market our Services. We may also disclose personal information to them to provide other services, including installation, removal, and servicing of our devices, payment processing, information technology, cybersecurity, fraud prevention, hosting, customer relationship management and support, communications delivery, marketing, advertising, and website and mobile application analytics. We may disclose personal information with our professional advisors, such as lawyers, auditors, bankers and insurers, in the course of the professional services that they render to us or our affiliates. We may also disclose your personal information with our verification partners, such as telecommunications providers (if you choose to confirm your account by providing your telephone number) or other vendors to help verify that you are who you say you are.

4.5 Within the Global IID Holdco, LLC corporate family.

We may disclose personal information within our "corporate family", including between 1A Smart Start LLC, Roadguard Interlock, LLC, Low Cost Interlock, Inc., and A Simple Interlock, LLC.

4.6 Parties associated with a business reorganization or corporate transaction.

We may disclose personal information with participants in transactions (or potential transactions) involving a corporate divestiture, merger, consolidation, acquisition, restructuring, reorganization, or sale or other disposition of some or all of the assets of, or equity interests in, Roadguard Interlock, LLC, its parent and their respective affiliates (including, in connection with a bankruptcy or similar proceedings).

4.7 We may share personal information with your employer, school, or any other person you consent to receive your information or authorize us to share your personal information with.

4.8 We may share personal information for other reasons we may describe to you from time to time or as permitted or required by law.

5. What Are My Privacy Choices?

You have certain choices about how we use your personal information.

You can opt out of receiving our marketing emails and text messages. To stop receiving our promotional emails, you can follow the instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still send you transactional messages. These include responses to your questions.

You can control certain location tracking tools on your phone. To control the collection of your precise location on your personal mobile device, you can adjust the settings on your mobile device, such as by disabling location services and turning off the Bluetooth and Wi-Fi. However, certain features of our Services may not work.

You can control certain cookies and tracking tools. To learn more about the trackers we use and to set your preferences, click on the Manage Cookies link in the footer of our website you visit. If there is no link available, then follow the instructions outlined below. Keep in mind that the cookies used on our various websites will differ and you will need to set your preferences on each site you visit. Your browser may also give you the ability to control cookies or other tracking tools. How you do so depends on the type of tool. Certain browsers can be set to reject browser cookies.

We and third-party advertising networks, social media companies, and other services may collect information about your use of our websites and apps over time so that they or we may display interest-based advertising using information gathered about you over time across multiple websites or other platforms. To do this, we and our vendors use several tracking tools, such as browser cookies, web beacons, and other technologies. To set your preferences related to this type of information collection and use, click on the Manage Cookies link in the footer of each website you visit. You can also visit www.aboutads.info/choices and <https://optout.privacyrights.info/> to opt out of certain uses of cookies for advertising purposes. We use Google Analytics to better understand how our users interact with our websites. You can learn about Google Analytics' currently available opt-outs at <https://tools.google.com/dlpage/gaoptout/>.

Some browsers have "do not track" features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals. If you block cookies, certain features on our site may not work. If you block or reject cookies, not all of the tracking described here will stop.

Options you select and choices you make are browser, website and device specific. If you clear your cookies or your browser's cache, you will need to set your preferences again.

6. How Long Is My Personal Information Kept?

We retain personal information in our server logs, our databases, and our records as described in this Privacy Policy, including as necessary to comply with our legal and business obligations, resolve disputes, and enforce our agreements.

7. Personal Information Processed in the United States.

Information we collect from you may be transferred to, processed in, or stored in the United States or another destination outside of your jurisdiction of residence. Information may be processed by personnel operating in these

locations who work for us or one of our business partners. As a result, this information may be subject to access by and disclosure to government and law enforcement agencies in those countries according to their laws. The standard of data protection in the United States and in certain other countries where we may process your information is considered by the European Commission and the UK government to be not adequate when compared to the data protection standards of the EU, EEA and the United Kingdom. By using our websites, apps, and services or submitting your personal data, you consent to such transfer, storing and processing.

8. How Is My Personal Information Protected?

8.1 Account security.

We cannot promise that your use of our websites, apps, or other Services will be completely safe. Any transmission of your data to our websites or apps is at your own risk. We encourage you to use caution when using the Internet. We encourage users to maintain complex passwords. Please ensure that you keep your password safe and do not reuse your password or share it with anyone.

8.2 Other services and websites.

When visiting the website, you may come across links to websites and services operated by third parties that are not owned or controlled by us. This Privacy Policy does not apply to information collected on any third party website or application that may link to or be accessible from our Services. These third parties have their own privacy policies, which govern any personal information they collect. We do not accept any responsibility or liability for such external websites' privacy or security practices.

9. Personal Information Relating to Children.

Only persons aged 16 or older have permission to access our Services. Our Services are not intended for anyone under the age of 16 and we do not knowingly collect personal information from anyone under the age of 16. If you are a parent or guardian and you believe that your child has provided us with personal information, please contact us at privacy@globaliid.com.

10. Changes to this Privacy Policy.

We may make changes to this Privacy Policy from time to time, so please review it periodically. If we materially change this Privacy Policy, we will take steps to notify you in advance of the change as required by applicable law. You acknowledge that your continued use of our Services after we publish our changes to this Privacy Policy means that you consent to the collection, use, and disclosure of your personal information as set out in the updated Privacy Policy.

11. How to Contact Us.

This Privacy Policy is available in alternative formats upon request. If you have any questions about this Privacy Policy or if you wish to make a request regarding your personal information, please email us at privacy@globaliid.com. You can also write to us or call toll free at:

Roadguard Interlock, LLC
1221 S. Beltline Road, Suite 700
Coppell, TX 75019
Telephone: 866-385-5900
Email: privacy@globaliid.com

12. California-Specific Disclosures.

12.1 California Privacy Disclosures

If you are a California resident, this section applies to you. This Section 12 is provided as a supplement to our Privacy Policy. For a more complete understanding of our privacy practices and how we handle personal information, please read our entire Privacy Policy.

California residents have the right to ask us one time each year if we have shared their personal information with third parties for their direct marketing purposes. To make a request, please send us an email at

privacy@globaliid.com, or write to us at the address listed in Section 11. Indicate in your letter that you are a California resident making a “Shine the Light” inquiry.