



PRIVACY POLICY

Last Updated and Effective as of 11/28/2022

WELCOME!

This Privacy Policy describes how we collect, use, disclose, and process your Personal Data (as defined below). We also describe your choices and rights with respect to how we process that Personal Data. Please read this policy carefully.

Your use of our Services indicates your acknowledgement of the practices described in this Policy.

WHO WE ARE

This is the Privacy Policy (“**Policy**”) of SnoBoxPro LLC. (“**SnoBox Pro**”, “**us**”, “**our**”, or “**we**”). You can contact us using the information below.

SCOPE

This Policy applies to our “**Services**” which include:

- Our website at snoboxpro.com and snobox.pro (including any subdomains or mobile versions our “**Site**”);
- Our online services and applications; (“**Apps**”); and
- Apps accessed via Client websites that are powered by SnoBoxPro (“**Client Pages**”).

We may provide our Services to ski shops, resorts, and other outdoor recreation partners that subscribe to our Services (“**Clients**”). This Policy does not apply to our Clients, and they may use Personal Data provided through the Services for their own purposes. However, the Policy will apply where we process Personal Data relating to Clients’ Authorized Users who use our Services.

This Policy also does not apply to information processed by third parties, for example, when you visit a third-party website or interact with third-party services, unless those parties collect or process information on our behalf. Please review any relevant third-party privacy policies for more information.

COLLECTION AND USE OF PERSONAL DATA

Personal Data We Collect

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“**Personal Data**”). We collect and process the following categories of Personal Data (note, specific Personal Data elements are examples and may change):

- Identity Data:** Personal Data about you and your identity, such as your name, username, profile data, and other Personal Data you may provide when you register for our Services or as part of a user/account profile.
- Contact Data:** Identity Data used to contact an individual, e.g. email address or phone number.
- Physical Data:** Data relating to your height, weight, shoe/boot size, and other physical characteristics.
- Commercial Data** Personal Data relating to your use of the Services, including your transactions/purchases, e.g. rental information, pricing, equipment preferences, DIN settings, and other similar information.



Financial Data Data relating to payment, such as a credit card number, payment tokens, or similar data.

Device/Network Data: Personal Data relating to your device, browser, or application e.g. IP addresses, MAC addresses, application ID/AdID/IDFA, identifiers from cookies, session history and similar browsing metadata, and other data generated through applications and browsers, including via cookies and similar technologies.

User Content: Personal Data included in content provided by users of the Services in a free-form or unstructured format, such as in a “contact us” box, free text field, document, or in messages.

How We Collect Personal Data

We collect Personal Data from various sources based on the context in which the Personal Data will be processed:

You: We collect Personal Data from you directly, for example, when you input information into an online form, sign up for a waiting list, register, or contact us directly.

Your Devices: We may collect certain Personal Data automatically from your devices. For example, we collect Device/Network Data automatically using cookies and similar technologies when you use our Services, access our Site, or when you open our marketing communications.

Service Providers: We receive Personal Data from third parties with whom we have a relationship in connection with a relevant transaction, or who collect information on our behalf.

Data we create or infer: We (or third parties operating on our behalf) create and infer Personal Data (such as Inference Data) based on our observations or analysis of other Personal Data we process, and we may correlate this data with other data we process about you.

How we Process Personal Data

Subscription & Account Registration

If register and create an account on our Services, we will process Identity Data, Physical Data, and Contact Data in connection with the creation, operation, and maintenance of that account. We may also collect certain User Content and from you if you choose to provide it, for example, to store User’s notes, Client-specific matter, other profile elements. We primarily use this Identity Data, Contact Data, and User Content as necessary to create, maintain, and provide you with important information about your account, and to otherwise provide the services and features you request.

Bookings & Rentals

We process Identity Data, Physical Data, Contact Data, Commercial Data, and Device/Network Data when you use our Apps to book equipment rentals or make other reservations. We primarily use this Personal Data as necessary to provide the services/features you request. For example, we may use this information to log you in, authenticate your access, complete orders, book and fulfil your rental, and otherwise provide you with the Services. Additionally, we may use Contact Data to contact you with transactional information regarding your rental. All booking information is also used in connection with our internal analytics and to create aggregate data.

Note: if you use a Client Site to reserve rentals with a Client, we may process your Personal Data on behalf of the Client and share your Personal Data with the Client so they may process your transaction.



Billing and Payment

We or our third party payment processors may collect Financial Data, Identity Data, Commercial Data and Contact Data in connection with the billing and payment for our Services, or when you provide us with a credit card or other accepted method for payment. We only use this information as necessary to processing the billing and payment transaction, to contact you with information regarding the transaction (e.g. payment success or failure, or transaction confirmation), and for security/antifraud and other internal business purposes (described below).

Marketing Communications

We may process Identity Data, Physical Data, Device/Network Data and Contact Data in connection with email marketing communications (such as promotional emails), which you might receive if you register for an account, choose to receive marketing communications, or engage in a transaction allowing us to send you those marketing communications. We may also automatically collect Device/Network Data when you open or interact with those marketing communications.

Contact Us

When you contact us through the Site using a 'contact us' box, through chat functions, or via email, we process Personal Data such as Identity Data, Device/Network Data, and any Personal Data contained within any User Content. We use Identity Data, Contact Data, and User Content as necessary to communicate with you about the subject matter of your request and related matters. We may use third party service providers who provide these services and collect data on our behalf.

Cookies and Similar Tracking Technologies

We, and certain third parties, automatically collect and process Identity Data, Contact Data, and Device/Network Data when you interact with cookies and similar technologies on our Services. We may receive this data from third parties to the extent allowed by the applicable partner. Please note that the privacy policies of third parties may also apply to these technologies and the Personal Data collected through them.

Subject to your rights & choices, we may use this information as follows:

- (i) for "essential" or "functional" purposes, such as to enable certain features of the Services, or keeping you logged in during your session;
- (ii) for "analytics" and "personalization" purposes, consistent with our business interest in how the Services are used or perform, how users engage with and navigate through our Services, what sites users visit before visiting the Services, how often they visit the Services, and other similar information, and modify the appearance of the Services to your usage history, tailor the Services based on geographic location, and understand characteristics of users in various technical and geographic contexts; and
- (iii) for "retargeting" or similar advertising purposes on our Site, so that you can see advertisements from us on other websites. These technologies and the data they collect, may be used by advertisers to deliver ads that are more relevant to you based on content you have viewed, including content on our Sites. These tracking technologies may also help prevent you from seeing the same advertisements too many times and help us understand whether you have interacted with or viewed ads we've delivered to you. This data collection may take place both on our Sites, as well as and on third-party websites that participate in the ad network (e.g. including as part of advertisements delivered by that ad network on a third-party website).

Note: Some of these technologies can be used to identify you across platforms, devices, sites, and services.



Business Purposes of Processing

In addition to the processing described above, we generally process Personal Data for several common purposes in connection with our business. For example, we will process the Personal Data we collect for the following purposes:

Operate our Services and Fulfill Obligations

We process any Personal Data as is necessary to provide the Services, and as otherwise necessary to fulfill our obligations to you, e.g. to provide you with the information, features, and services you request.

Personalization

We process certain Personal Data as necessary in connection with our legitimate business interest in personalizing our Services, including analyzing Personal Data to recommend sizing, configuration, equipment, shops, or make other relevant recommendations. We may also modify the appearance of the services, e.g. to reflect your preferences, frequent orders, and the like.

Internal Processes and Service Improvement

We may use any Personal Data we process through our Services as necessary in connection with our improvement of the design of our Services, understanding how our Services are used or function, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to service use, and for ensuring the security and stability of the Services. Additionally, we may use Personal Data to understand what parts of our Services are most relevant to users, how users interact with various aspects of our Services, how our Services perform or fail to perform, etc., or we may analyze use of the Services to determine if there are specific activities that might indicate an information security risk to the Services or our Clients or Users.

Aggregate Data and Analytics

We process Personal Data as necessary in connection with our creation of aggregate analytics relating to how our Services are used, industry trends (e.g. equipment, configurations, locations, etc.), to understand how our service performs, and to create other reports regarding the use of our Services, demographics of our Users, and other similar information and metrics. In addition, we may de-identify data and retain information relating to transactions (e.g. de-identified Commercial Data) and process that data to create analytics relating to the use of our Services. De-identified and aggregated data will not contain information from which an individual may be reasonably re-identified. This processing may be subject to your rights and choices, described below.

Compliance, Health, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Data subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil applicable legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest, or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Data in extraordinary circumstances.

Other Processing of Personal Data

If we process Personal Data in connection with our Services in a way not described in this Policy, this Policy will still apply generally (e.g. with respect to your rights and choices) unless otherwise stated when you provide it.



DATA SHARING

Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, each described below.

Service Providers

In connection with our general business operations, product/service improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Data with service providers or subprocessors who provide certain services or process data on our behalf. For example, we may disclose information as part of our own internal operations, with vendors such as cloud-hosting providers, CRM providers, code management platforms, payment processors, IT security vendors, and other utilities or functions.

Clients

We may process certain data on behalf of our Clients, and we may share certain Personal Data with Clients to the extent such information was provided to us for processing on our Client's behalf, or in the event the Client has a legitimate business purpose for receiving the information. For example, when you use our Apps to book a reservation on a Client Site, we share your booking information with the Client, and we process Personal Data on their behalf. Similarly, Authorized User account information (for example name and email) may be made available to the relevant Client as necessary to document a Client's use of the Services, or as appropriate to ensure the security of Authorized User accounts.

Corporate Events

Your Personal Data may be processed in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Data may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Affiliates

In order to streamline certain business operations and develop products and services that better meet the interests and needs of our Clients, and for other authorized purposes, we may share your Personal Data with any of our current or future affiliated entities, subsidiaries, and parent companies.

Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Data, any communications sent or received by you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, to investigate violations of our Terms of Use or a Services Agreement, or in the vital interests of us or any person. We may, in our sole discretion (but without any obligation except as required by law), object to the disclosure of your Personal Data to such parties.

YOUR RIGHTS AND CHOICES

Your Rights

Applicable law may grant you rights in your Personal Data. These rights vary based on your location, state/country of residence. Your rights and our obligations may be subject to certain exemptions in applicable laws and may be limited by other individuals' rights in their own data. If and to the extent applicable law grants you rights in the



Personal Data we process, you may submit a request to exercise those rights by contacting us at [legal@snoboxpro.com].

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you log in to your account or verify that you have access to your account or the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf. If you used our Services on a Client Site, please contact the Client for any data rights requests.

For information regarding California Privacy Rights (for California residents), please see the "California Privacy Rights" section below.

Your Choices

You may have the following choices regarding the Personal Data we process, to the extent provided under applicable law:

Consent: If you consent to processing, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services.

Direct Marketing: You have the choice to opt-out of or withdraw your consent to marketing communications. You may have a legal right not to receive such messages in certain circumstances, in which case, you will only receive direct marketing communications if you consent. You may exercise your choice via the links in our communications or by contacting us re: direct marketing.

Cookies & Similar Tech: You may opt out or withdraw your consent to online advertising. You must opt out of certain third-party services directly via the third party. For example, to opt out of Google's use of cookies, visit Google's Ads Settings, [here](#). If you wish to take steps to opt-out of tracking by certain online advertisers, you can visit the Digital Advertising Alliance's opt-out page at <http://www.aboutads.info/choices> or the Network Advertising Initiative at www.networkadvertising.org/optout_nonppii.asp.

SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Data you provide us. However, we sometimes share Personal Data with third parties as noted above, and though we may enter contracts to help ensure security, we do control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Data or any other information you provide us will remain secure.

DATA RETENTION

We retain information for so long as it, in our discretion, remains relevant to its authorized processing purpose, and in any event, for so long as is required by law. We will review retention periods periodically and may sometimes pseudonymize or anonymize data held for longer periods, if appropriate.

INTERNATIONAL TRANSFERS

We are a U.S. company and use service providers located in the U.S. If you are located outside the U.S., your Personal Data will be transferred to the U.S. for processing.



MINORS

Our Services are neither directed at nor intended for use by minors under the age of majority in the relevant jurisdiction. Further, we do not knowingly collect Personal Data from such individuals. If we learn that we have inadvertently done so, we will promptly delete it. If you provide Personal Data relating to a minor, you agree to our processing of that Personal Data as provided in this Policy. Do not provide any information relating to a minor (or any third party) unless you have all necessary rights to do so.

CHANGES TO OUR POLICY

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Services following notice of any changes indicates acceptance of any changes.

CONTACT US

Feel free to contact us with questions or concerns using the appropriate address below.

General inquires: [legal@snoboxpro.com]

Data rights requests: [legal@snoboxpro.com]

YOUR CALIFORNIA PRIVACY RIGHTS

If and to the extent the California Consumer Privacy Act (“CCPA”) applies to the Personal Data we process, and as provided under other California laws, California residents may have the following rights, subject to your submission of an appropriately verified request (see below for verification requirements):

Privacy Rights

Right to Know

You may have the right to request any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected or sold your Personal Data; (4) the categories of third parties to whom we have sold your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you. See below for a table summarizing this information.

Right to Delete

You may have the right to have us delete (or deidentify) certain Personal Data that we hold about you, subject to exceptions under applicable law.

Right to Non-Discrimination

You may have the right to not to receive discriminatory treatment as a result of your exercise of any rights conferred by the CCPA.

Direct Marketing

You may have the right to request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes (if any) during the preceding calendar year.



Opt-Out of Sale

At this time, we do not sell Personal Data. If we engage in sales of Personal Data in the future (as defined by applicable law), you may direct us to stop selling or disclosing Personal Data to third parties for commercial purposes.

Submission of Rights Requests

If and to the extent the CCPA applies to you and the Personal Data we process, you may submit requests, via at [legal@snoboxpro.com]. See below for information regarding information that you must submit to verify your identity.

Verification of Rights Requests

All rights requests must be verified to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you provide the email address we have on file for you (and verify that you can access that email account) and we may request additional information such as an address, phone number, or other data we have on file, in order to verify your identity. Depending on the sensitivity of the Personal Data you request and what type of request you submit, we may request additional information from you. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

Supplemental Data Processing Disclosures

Categories of Personal Data Disclosed for Business Purposes

For purposes of the CCPA, we may disclose to Service Providers for “business purposes” the following categories of Personal Data: Identity Data, Contact Data, Commercial Data, Device/Network Data, Physical Data, and User Content.

Data Sale

For purposes of the CCPA, we do not “sell” your Personal Data.

Right to Know

Category of Data	Category of Sources	Business and Commercial Purposes	Category of Recipients
Identity Data	You; Automatic collection; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures
Contact Data	You; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures



Commercial Data	You; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures
Financial Data	You; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Compliance, Health, Safety & Public Interest; Other Processing	Service Providers; Affiliates; Corporate Events; Legal Disclosures
Device/ Network Data	Automatic collection; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures
Physical Data	You; Third parties	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures
User Content	You	Service Provision and Contractual Obligations; Internal Processes and Service Improvement; Aggregate Analytics; Marketing Communications; Compliance, Health, Safety & Public Interest; Other Processing	Clients; Service Providers; Affiliates; Corporate Events; Legal Disclosures