

Bonso Body Fat Scale Privacy Policy

Effective Oct 8, 2019

Our Policy

Bonso Corporation (“Bonso.com”, “we”, “us”, or “our”) provides users with information, services, and tools through the Bonso.com website, the Bonso.com mobile applications (“Apps”), the Bonso.com smart scale application programming interface (“API”), and other websites, apps, and online services that link to this Privacy Policy (collectively, the “Services”). This Privacy Policy sets forth our policies with respect to how we collect, use, and share information through the Services. This Privacy Policy is incorporated by reference in the Bonso.com End User Terms of Use, which govern your use of the Services.

By voluntarily providing us with Personal Data, as defined below, you are consenting to our use of it in accordance with this Privacy Policy. If you provide Personal Data through the Services, you acknowledge and agree that such Personal Data may be transferred from your current location to our offices and servers, or those of our affiliates or contractors, located in the United States and other countries. Those countries may have data protection laws that are different from those in your country of residence. If you would like us to cease using your Personal Data, you may delete your account by following the instructions provided in the “Data Retention and Deletion” section below or exercise the choices described in the “Your Choices and Access to Information” section below.

Information We Collect

We collect both Personal Data and Other Information in connection with the Services. “Personal Data” is information that relates to an identified or identifiable natural person, such as your name, email address, and similar information associated with your Bonso.com account. “Other Information” is any information that is not Personal Data, such as information about usage of the Services that does not identify you personally. If we combine Other Information with Personal Data, we will treat the combined information as Personal Data in accordance with this Privacy Policy.

We collect various types of Personal Data through our Services, including:

Personal Data That You Provide Directly to Us: We collect Personal Data when you voluntarily choose to provide such information directly to us, such as when you register for access to the Services, contact us with inquiries, pay us for paid services, respond to one of our surveys, participate in a promotion, claim a third-party reward or offer, or invite a friend to use the Services. Such information may include, among other things:

Name

Email address

Phone number

Username and password

Mailing address

Gender

Birth date

Photograph

Personal characteristics, such as weight and height

Payment card information

Weight and Body Compositions Data: We collect information about your use of the Services and your weights and body compositions through our Apps or online services that you associate with our Apps (including via our Bonso.com or mobile apps smart scale application programming interface API). Such information may include, for example:

Weight

Body Mass Index (BMI)

Body Fat

Visceral Fat

Body Water

Muscle Mass

Bone Mass

others

Contacts: We may collect information about contacts stored on your device, as well as friends you invite to the app, if you choose to share such information with us. We use this information to find, invite, and connect you with friends on the Services.

Social Media or Third-Party Account Information: We may receive Personal Data from your social media or other third-party account provider (such as Fitbit, Apple Health, Google Fit) if you log into our Services using your social media account or link your social media or other account to the Services. In those circumstances, we may receive information from the third party, such as your email, username, profile picture, and friends list.

User-Generated Content: We collect information when you submit comments, photos, reviews, messages, or otherwise post content to the Services.

We also collect Other Information through our Services. Such information may be collected passively using various technologies to work with the Services. We may store such information ourselves, or it may be included in databases owned and maintained by our affiliates, agents, or service providers. We may use such information and pool it with additional information to track, for example, the total number of visitors to the Services, the number of visitors to each page of the Services, and the domain names of our visitors' Internet service providers. Other Information may be collected in the following ways:

Log Data: When you use the Services, we automatically receive and record certain information from your computer, mobile phone, tablet, or other device. This may include data such as your IP address, the pages you visit or features you use within the Services, the date and time of your activities on the Services, the URLs from the websites you visit before and after navigating to the Services, your software and hardware attributes (including operating system type and version, App version, device type, and device identifiers, including IDFA and/or Advertising IDs), your browser type and version, and your general geographic location derived through your IP address (e.g., your city, state, or metropolitan region). To obtain such information, we may use web logs or applications that recognize your device and gather information about its online activity.

Cookies: In providing the Services, we may use cookies. Cookies are small files that are stored on your computer, mobile phone, or other device by your web browser. Our cookies help provide additional functionality to the Services and help us analyze usage

of the Services more accurately. For instance, our Services may set a cookie on your browser that keeps you from needing to remember and then enter a password more than once during a visit to the site. Cookies also can be used to collect information about your use of the Services during your current session and over time (including the web pages you view and the files you download), the operating system and browser type of your computer or other device, your Internet service provider, your domain name and IP address, your general geographic location, the website that you visited before the Services, and the link you used to leave the Services. In addition to cookies used by Bonso.com, we permit third parties to set cookies, too (see below). On most web browsers, you will find a “help” section on the toolbar. Please refer to this section for information on how to receive notification when you are receiving a new cookie and how to refuse some or all cookies, or to delete existing cookies from your device. We recommend that you leave cookies turned on because they allow you to take advantage of some of the Services’ features.

Web Beacons: The Services or the emails that you receive from us may use an application known as a “web beacon” (also known as a “clear gif” or “pixel tag”). A web beacon is an electronic file that usually consists of a single-pixel image. It can be embedded in a web page or in an email to set or access cookies or transmit information, which could include Personal Data. For example, it allows an email sender to determine whether a user has opened a particular email. In addition to web beacons used by Bonso.com, we permit third parties to use web beacons, too (see below).

Collaboration with Third-Party Data Collectors: We also may partner with certain third parties to collect, analyze, and use some of the information described in this section. For example, we may allow third parties to set cookies or use web beacons or other tracking mechanisms (such as tags or scripts) on the Services or in email communications from us, or we may allow third parties to use an application software development kit (SDK) or a server-to-server connection to collect information. An SDK is a section of code that we embed in our Apps to allow third parties to collect information about how users interact with the app, and a server-to-server connection enables us to exchange data with third parties when an SDK integration is not feasible or practical. The information collected by third parties using these technologies may be used for a variety of purposes, including analytics and targeted interest-based advertising, as discussed below (see the section entitled “Our Disclosure of Your Personal Data and Other Information”).

Demographic or Inferred-Interest Data: We may supplement the information that we collect with additional information that we receive from third parties, such as demographic or inferred-interest data.

De-Identified or Aggregated Information: In an ongoing effort to better understand and serve the users of the Services, we may conduct research on our end users’ demographics, interests, and behavior based on the Personal Data and other information provided to us. This research does not identify you personally. We may share this de-identified data with our affiliates, agents, and business partners. We may also disclose aggregated user statistics (which also do not identify you) in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes.

Our Use of Personal Data and Other Information

We use the Personal Data and Other Information we collect for various purposes, including:

To track your wellness information, manage your goals and achievements, evaluate your progress, and set challenges.

To provide you with location-based features, such as providing information, offers, and advertising based on your locations. We also may partner with third parties to analyze the location data that we collect in order to develop new products and services.

To provide the Services, create and manage user accounts, process payments and orders, respond to your questions and requests, resolve complaints, and otherwise complete a transaction that you initiate or fulfill the terms of any agreement you have with us.

To communicate with you through email and notices posted via the Services. These communications may include a series of welcome emails that help inform you about various features of the Services. Please be aware that you will always receive certain emails from us related to the proper functioning of your account.

To send you promotional emails and newsletters, in a manner consistent with your email preferences and applicable laws. If you wish to opt out of receiving promotional emails at any time, please click the “unsubscribe” link at the bottom of the email. Please note that if you unsubscribe from promotional emails, you will continue to receive non-promotional emails with information relevant to your account and the operation of the Services.

To deliver offers and advertising about products and services we believe will interest you, including through online interest-based ads, targeted offers, location-based ads, and workout rewards.

To create a custom experience for our users and tailor our products and Services to your interests and preferences.

To enable social-sharing functionality, to find your friends on the Services, and to provide other features that allow you to communicate and interact with other users of the Services or users of third-party services that you connect to your account (such as Facebook or Twitter).

To conduct health and fitness-related research and collaborate with third parties for such research purposes.

To operate our business, prevent fraud, analyze the use of our Services, improve the content and functionality of the Services, and better understand our users.

To comply with legal or regulatory requirements and to defend or enforce our rights, including as described in the “Our Disclosure of Your Personal Data and Other Information” section below.

Our Disclosure of Personal Data and Other Information

In addition to Health and Wellness Clubs or other Institutions, we may share your Personal Data and Other Information with third parties in the following circumstances:

Service Providers, Agents, and Related Third Parties: We sometimes hire other companies to perform certain business-related functions. Examples include mailing information, email marketing, maintaining databases, and processing payments. When we use another company to perform a function of this nature, we may need to provide them with access to certain Personal Data or Other Information. We also partner with

third parties to engage in analytics and interest-based advertising services, as described below in the “Third-Party Analytics and Interest-Based Advertising” section.

Location Sharing: We share location information automatically with some third-party partners, such as Google Maps, in order to provide the Services to you. We also share location information with other third parties with your explicit permission; when you choose to share it directly with other users, such as through the Bonso.com Fitness and Wellness API and Facebook; if the data is in a de-identified or aggregated form; and to help us analyze location data or deliver relevant offers or advertising to you based on your location.

Your Sharing of Information through the Services or Third-Party Services: We allow you to share information about your fitness activities and other actions with other users of the Services. We also enable you to share such information with users of third-party services, such as through your social media accounts or through the Bonso.com Fitness and Wellness API. Please note that any Personal Data you provide to be displayed in your publicly-available online profile will be displayed for others to see. We cannot and will not be responsible for what third parties do with any Personal Data that you choose to make publicly available. As such, we advise that you exercise great care in determining what information you choose to make publicly available through the Services or on third-party services. Please see the “Your Choices and Access to Information” section below to learn how to adjust your sharing preferences through the Services.

Facebook Custom Audiences and Similar Programs: We may partner with Facebook and other social media partners to deliver advertisements to our users via the Facebook Custom Audiences program or a similar third-party program. In order to identify and reach our users on Facebook or another third-party service, we may share information such as an email address or phone number with Facebook or the other third-party service. If you would like to opt out of receiving advertisements from us through such programs based on your email address or phone number, please send us an email at info@Bonso.com. For more information about custom audience targeting and how to adjust your social media advertising preferences, please review the privacy policy of your social media provider.

Legal Requirements: We may also disclose your Personal Data or Other Information if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation such as a judicial or governmental subpoena or warrant, (ii) protect and defend our rights or property, (iii) act in urgent circumstances to investigate or protect the personal safety of users of the Services or the public, or (iv) protect against legal liability, prevent suspected fraud, or establish, protect, or exercise our legal rights.

Financing, Business Transfers, and Similar Transactions: As we develop our business, we might sell or buy businesses or assets. In the event of a sale, merger, reorganization, dissolution or similar event relating to all or a portion of our business or assets, Personal Data or Other Information may be part of the transferred assets. We also may share Personal Data or Other Information to facilitate the potential or actual financing, securitization, insuring, merger, acquisition, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.

De-Identified or Aggregated Information: We may disclose aggregate or de-identified information to third parties.

Third-Party Analytics and Interest-Based Advertising

Analytics: We partner with certain third parties to collect information for the purpose of engaging in analysis, auditing, research, and reporting on the Services and to understand the effectiveness of our advertising and email marketing. These third parties may use web logs or web beacons, and they may set and access cookies or use similar tracking technologies on your computer or other device. They also may use SDKs and device identifiers to collect information about your use of the Apps. In particular, our Services use Google Analytics to help collect and analyze certain information for the purposes discussed above. Information about these services and how you may opt out of certain activities is available here for Google Analytics.

Online Interest-Based Advertising: The Services also enable third parties to collect information through cookies, web beacons, and device identifiers, for use in online interest-based advertising. For example, third parties may use the fact that you visited our website or used our Apps to target online ads for Bonso.com services to you on non-Bonso.com websites or mobile apps. In addition, we or our third-party advertising networks might use information about your use of the Services to help target non-Bonso.com advertisements to you on unaffiliated websites or mobile apps based on your online activity in general.

We and our third-party providers may use collected information to establish connections among related web browsers and devices (such as smartphones, tablets, and computers) for advertising, analytics, attribution, and reporting purposes. We may match your browsers or devices if you log into the same online service on multiple devices or if your devices share similar attributes that support an inference that they are used by the same person or household. This means that information about your activity on websites or apps on your current browser or device may be combined and used with information collected from your other browsers or devices. For example, we or our third-party providers may use this information to deliver the same ad on multiple devices, to limit the number of times you see an ad across your devices, and to help measure the effectiveness of advertising campaigns across devices.

You may opt out of our third-party service providers' interest-based advertising practices and cross-device technologies in web browsers and mobile apps by following the instructions below. Please note that the opt-out will apply only to the specific browser or device from which you opt out, and therefore you will need to opt out separately on all of your browsers and devices. If you delete or reset your cookies or mobile identifiers, change browsers, or use a different device, any opt-out cookie or tool may no longer work and you will have to opt out again.

The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies. If you prefer to prevent third parties from setting and accessing cookies on your computer or other device, you also may set your browser to block cookies.

Your Choices and Access to Information

We provide users with a variety of choices regarding how we or third parties collect, use, and share information, including as follows:

You can update or change certain information associated with your account through the Settings page within our Apps or by logging into your account on www.Bonso.com.

You can opt out of online interest-based advertising and certain types of analytics by

Following the instructions provided in the “Third-Party Analytics and Interest-Based Advertising” section above.

Users may have additional rights to access, review, correct, delete, or inquire about information that we hold about them. To make such a request, please send us an email at info@Bonso.com. Please note that we may need to verify your identity or request additional information from you before we are able to comply with your request.

Data Retention and Deletion

We retain information for as long as reasonably necessary to deliver our Services to you or to fulfill the purposes described in this Policy. For example, we may retain your profile information and information about your weight and body compositions during a certain period for as long as you maintain your Bonso.com account. This provides you with the ability to review your activities over time, track your progress toward personal goals and challenges, and remember your past achievements and milestones (for example, your weight loss goals or other personal achievements).

Because our users may take extended breaks from using scales and may use our Apps on various devices, we do not delete information automatically based on account inactivity or when you uninstall our Apps from one of your devices. However, we provide you with the ability to delete information associated with your account, as follows:

You may remove a specific activity from your account on a specific date and time.

You may delete your Bonso.com account and information associated with your account.

If you choose to delete your Bonso.com account, we will make our best effort to delete all information associated with your account, including your profile information, historical data, and third-party authorizations for services connected to your account. However, please note that certain information may be retained in backup databases or for analytics purposes.

In limited circumstances, we may retain information for a longer period of time as required by law.

Security

We implement reasonable administrative, technical, and physical measures to protect the Personal Data provided via the Services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet or e-mail transmission is ever fully secure or error free. Therefore, you should take special care in deciding what information you send to us via email or the Internet.

Data Integrity

We process Personal Data for our legitimate business purposes and in accordance with this Policy or any applicable service-specific privacy notice. We take reasonable steps to ensure that the Personal Data we process is accurate, complete, and current, but we depend on our users to update or correct their Personal Data whenever necessary.

Health Information

We do not use information collected through the Services to infer health information that we consider sensitive, such as a user’s past, present or potential future health or medical condition or treatment, including but not limited to genetic, genomic, and family medical history. We may, however, infer a user’s potential interest in certain non-sensitive health and wellness categories, such as exercise and fitness activities, endurance activities, distance running, diet and weight loss, nutrition, healthy living, or

physical and massage therapy. We may use this non-sensitive health and wellness information for the purpose of delivering more relevant content, services, offers, and advertising to our users.

Children

We do not knowingly collect Personal Data from children under the age of 13 and do not target our Services to children under 13. If you are under 13, please do not submit any Personal Data through the Services. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children to never provide Personal Data through any of our Services without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to us, please contact us, and we will endeavor to delete that information from our databases.

Links to Other Websites or Services

This Privacy Policy applies only to information collected through the Services. The Services may contain references or links to other websites or services not operated or controlled by us (the "Third Party Services"). The policies and procedures we described here do not apply to the Third Party Services. The links from the Services do not imply our review or endorsement of the Third Party Services. We suggest contacting those sites directly for information on their privacy policies.

Changes to Our Privacy Policy

Our Services may change from time to time. As a result, we may need to change this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. We will post any revised Privacy Policy on our website with an "effective date" indicating when the changes will take effect. We encourage you to review this Privacy Policy periodically, and especially before you provide any Personal Data. Your continued use of the Services after a revised Privacy Policy becomes effective shall indicate your agreement with the terms of such revised Privacy Policy.

Contacting Us

If you have any questions or concerns about this Privacy Policy or our information collection, use, and sharing practices, please feel free to contact us at any time at support@bonso.com.