

Smart Label Solutions Mobile, Embedded, and Cloud Service Privacy Policy

Last Updated: March 4, 2020

This Smart Label Solutions, Inc. (“SLS”) Mobile, Embedded, and Cloud Privacy Policy (“Privacy Policy”) governs SLS’s privacy policies and practices applicable to any customer, partner and third-party (each, an “Entity User”) granted access to and use of SLS’s proprietary mobile, embedded or cloud-based platforms and associated modules and components (the “SLS smartVIEW Mobile, Embedded, and Cloud” or “Service”) and any authorized employee, consultant, contractor, customer, supplier or agent of such Entity User who accesses or uses the Services (each, an “End User” and collectively, the “End Users”).

This Privacy Policy only applies to SLS’s use of data in connection with the Services. It does not cover or apply to data or information collected by SLS for other purposes, such as information collected from visitors to the SLS website located at <https://slsrfid.com> which may be used for sales and marketing purposes. This Privacy Policy describes how SLS collects, uses, shares and secures the personal information you provide regarding the End Users of the Service. It also describes your choices regarding use, access and correction of your personal information. For information about SLS’s website privacy policy and practices, please contact SLS directly by regular mail addressed to:

Smart Label Solutions, Inc.
Attn: Privacy
2287 Grand Commerce Drive
Howell, MI 48855
United States

Personal Information SLS Processes

In the normal course of using the Service, End Users will input electronic data into the SLS Mobile, Embedded, and Cloud (“User Data”). The use of information collected through the Service shall be limited to the purpose of providing the Service for which the Entity User has engaged SLS. SLS may access User Data for the purposes of providing the Service, preventing or addressing service or technical problems, responding to support issues, responding to Entity User’s or End User’s instructions or as may be required by law, in accordance with the relevant agreement between the Entity User and SLS.

SLS processes User Data under the direction of its Entity Users and has no direct control or ownership of the personal data it processes. Entity Users are responsible for complying with

any regulations or laws that require providing notice, disclosure and/or obtaining consent prior to transferring the data to SLS for processing purposes.

An End User who seeks access to, or who seeks to correct, amend, or delete such End User's User Data should direct his or her query to the Entity User (i.e., the SLS customer) that controls such data's use by the Services (the data controller). If the Entity User or an End User requests SLS to remove User Data that is personal data to comply with data protection regulations, SLS will respond to their request within 30 business days or, if such data cannot be accessed or retrieved using commercially reasonable efforts during such 30 business day period, then such other reasonable period of time under the circumstances. If SLS is unable to fulfill an Entity User's customer request to delete data, SLS will provide the Entity User with a written response as to the reasons within 30 business days of the request.

SLS will refer any request for disclosure of an End User's personal data by a law enforcement authority to the Entity User associated with such End User. SLS may, where it concludes that it is legally obligated to do so, disclose personal data to law enforcement or other government authorities. SLS will notify the Entity User of such request unless prohibited by law.

Accessing the Service

Entity Users and their authorized End Users may access the Service directly through a sign-on page or may elect to use internal launch pages for single sign on or other purposes. Entity Users input information for processing and storage as they use the Service. Entity Users may also configure the Service to allow End Users to input information directly into the Service.

Data Retention

SLS retains User Data according to the timeframes set forth in the relevant agreement with its Entity Users. We may retain your User Data for as long as your account is active or as needed to provide you the Service, comply with our legal obligations, resolve disputes and enforce our agreements.

Security

The security of User Data, including personal data, is very important to SLS. SLS maintains information security policies and procedures that contain industry standard safeguards designed to prevent unauthorized access to User Data. SLS designs its applications to allow Entity Users to achieve differentiated configurations, enforce End User access controls, and manage data as desired by management of the Entity User. Configuring these settings appropriately is the Entity User's responsibility. Additional information about the security settings and configurations can be found in the SLS Mobile, Embedded, and Cloud documentation made available to Entity Users.

Types of personal data collected and purposes of collection and use

SLS limits personal data to company email and name about End Users, that Entity Users or their authorized End Users either enter into the Service or provide to SLS under a professional services engagement to be input into or accessed within the Service (collectively, “Services Personal Data”).

SLS acts as a data processor with respect to this Services Personal Data. SLS processes Services Personal Data to provide and support the Service purchased by the Entity User and for such other services purchased by the Entity User and performed by SLS. SLS processes Services Personal Data as instructed by its Entity Users and does not control or own the Services Personal Data it processes.

Type of third parties to which we disclose personal data and purposes

As a data processor, SLS will disclose Services Personal Data only as instructed by the data controller (i.e., the Entity User). In some cases, we may share Services Personal Data with our subcontractors to provide the Service to Entity Users. If SLS goes through a business transition, such as a merger, acquisition by another company or sale of all or a portion of its assets. In all cases, Services Personal Data may only be transferred in accordance with the relevant agreement covering the Services between the Entity User and SLS.

Requirement to disclose

SLS may be required to disclose Services Personal Data in special cases when we have a good faith belief that such action is necessary to conform to legal requirements or to respond to lawful requests by public authorities, including to meet national security or law enforcement requirements. SLS will notify the Entity User of such request unless prohibited by law.

Right to access

If SLS is the data processor, an End User who seeks access to, or who seeks to correct, amend, or delete such End User’s User Data should direct his or her query to the Entity User (i.e., the SLS customer) that controls such data’s use by the Services (the data controller). In some instances, the Entity User may have enabled the End User to perform these updates themselves through the Service. If the Entity User or an End User requests SLS to remove User Data that is personal data to comply with data protection regulations, SLS will respond to their request within 30 business days or, if such data cannot be accessed or retrieved using commercially reasonable efforts during such 30 business day period, then such other reasonable period of time under the circumstances. If SLS is unable to fulfill an Entity User’s customer request to delete data, SLS will provide the Entity User with a written response as to the reasons within 30 business days of the request.

Choices and means

SLS retains Services Personal Data according to the timeframes set forth in the relevant agreement between SLS and the Entity User. End Users who would like to request that their

personal data not be used for specific purposes or disclosed should contact the Entity User (the data controller).

Investigatory and enforcement powers of the FTC

SLS is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission. ~~SLS also is committed to cooperating with the DPAs located in the EEA.~~

Inquiries or Complaints

Please refer any inquiries or complaints regarding SLS's Privacy Practices by regular mail addressed to:

Smart Label Solutions, Inc.
Attn: Privacy
2287 Grand Commerce Drive
Howell, MI 48855
United States

Changes to this Privacy Policy

SLS reserves the right to change or update this Privacy Policy at any time. Changes to this Privacy Policy will be posted on this website and links to the Privacy Policy will indicate that this Privacy Policy has been changed or updated. If we make any material changes, we will notify End Users by means of a notice within the Service when the change becomes effective. We encourage you to periodically review this Privacy Policy for any changes.

Compliance

SLS has appointed personnel responsible for overseeing the implementation of the privacy program in the organization. If you have further questions related to this policy, please ask your SLS customer care contact to log a customer care case with the privacy question.