



Privacy Shield Privacy Policy

Effective Date: December 31, 2018

Kastle has certified certain of our services, for which we act as a data processor, under the EU-U.S. Privacy Shield Framework. To learn more about the Privacy Shield program, and to view Kastle's certification, please visit <https://www.privacyshield.gov>. If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

Scope: Kastle Systems International, LLC and our U.S. subsidiaries adhere to the principles of the EU-U.S. Privacy Shield Framework with respect to the personal data provided by our customers in reliance on the Privacy Shield Framework. Kastle's U.S. subsidiaries include the following entities: Kastle Systems of Los Angeles PSP, Kastle Systems of Texas LLC, Kastle Systems of New York LLC, Kastle Systems of Chicago LLC, CheckVideo LLC, and Kastle Systems of Los Angeles LLC. We refer to Kastle Systems International, LLC and our U.S. subsidiaries together as "Kastle."

Data Processed: Kastle provides security products and solutions that help our customers monitor and maintain security. Our services include the myKastle and myKastle Multifamily platforms; KastlePresence, KastleResident, KastleVisitorPass, and KastleAlert applications; KastleVideo and KastleVisitor solutions, and KastleConnect APIs such as EventConnect, VisitorConnect and IdentityConnect. In providing these services, Kastle processes the data our customers submit to our services or instruct us to process on their behalves. This data typically includes the following information about our customers' employees, customers, visitors, and other individuals who may enter their premises: *contact information* (such as name, employment information, address, email address, and phone number) and *security system information*, including audio and video feeds and access logs from our customers' Kastle security systems.

Purposes of Processing: Kastle processes data submitted by customers for the purpose of providing Kastle's services to our customers. To fulfill these purposes, Kastle may access the data to provide the services, to correct and address technical or service problems, or to follow instructions of the Kastle customer who submitted the data, or in response to contractual requirements.

Third Parties Who May Receive Personal Data: Kastle uses a limited number of third-party service providers to assist us in providing our services to customers. These third party providers assist with the transmission of data and provide data storage services. These third parties may access, process, or store personal data in the course of providing their services. Kastle maintains contracts with these third parties regulating their access, use and disclosure of personal data in compliance with our Privacy Shield obligations, including the onward transfer provisions, and

Kastle remains liable if they fail to meet those obligations and we are responsible for the event giving rise to damage.

Your Rights to Access, to Limit Use, and to Limit Disclosure: EU individuals have rights to access personal data about them, and to limit use and disclosure of their personal data. With our Privacy Shield self-certification, Kastle has committed to respect those rights. Because Kastle personnel have limited ability to access data our customers submit to our services, if you wish to request access, to limit use, or to limit disclosure, please provide the name of the Kastle customer who submitted your data to our services. We will refer your request to that customer, and will support them as needed in responding to your request.

U.S. Federal Trade Commission enforcement: Kastle's commitments under the Privacy Shield are subject to the investigatory and enforcement powers of the United States Federal Trade Commission.

Compelled Disclosure: Kastle may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Inquiries or Complaints: If you believe Kastle maintains your personal data in one of the services within the scope of our Privacy Shield certification, you may direct any inquiries or complaints concerning our Privacy Shield compliance to Kastle's Office of the General Counsel at Compliance@kastle.com. Kastle will respond within 45 days. If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact JAMS, our U.S.-based third party dispute resolution provider, free of charge at <https://www.jamsadr.com/eu-us-privacy-shield>. If neither Kastle nor our dispute resolution provider resolves your complaint, you may have the possibility to engage in binding arbitration through the Privacy Shield Panel.

Changes to this Privacy Shield Privacy Policy: We may be required to amend this Privacy Shield Privacy Policy to maintain compliance with the requirements of the U.S.-EU Privacy Shield Framework.

Contact Us: Questions or comments regarding this Policy should be submitted to Kastle's Office of the General Counsel by email to Compliance@Kastle.com or by mail to: Kastle Systems International LLC, 6402 Arlington Blvd. Falls Church, VA 22042.