

Contents

Shokz Privacy Policy(United Kingdom)	1
Shokz Privacy Policy(Australia)	31

Shokz Privacy Policy (United Kingdom)

Effective date: 1st August, 2022

INTRODUCTION

Shokz Holding Limited, AfterShokz Euro B.V., Shenzhen Shokz Co., Ltd., AfterShokz LLC and its affiliated companies under common ownership and control within the Shokz family of companies (collectively, "Shokz", "we", "our" or "us") respect the privacy of the viewer/visitor/user ("you"). Your privacy is important to Shokz so we've developed this Privacy Policy. We have revamped the Privacy Policy front and back so that from the effective date onwards, this Privacy Policy can provide privacy details on how we manage your personal information for all Shokz products and services, unless a separate privacy policy is provided for a specific Shokz product or service.

This Privacy Policy contains the following sections:

- [Our Comment to You](#)
- [The Information We Collect and How We Use It](#)
- [Legal Bases for Use of Your Information](#)
- [Direct Marketing](#)
- [Cookies and Similar Technologies](#)
- [How We Share and Disclose Your Information](#)
- [Security Safeguards](#)
- [Retention of Your Information](#)
- [Data Subject Rights and Your Choices](#)
- [Additional Information for Certain Jurisdictions](#)
- [Transfer of Personal Information Outside of Your Jurisdiction](#)
- [Children's Privacy](#)
- [Third-Party Links and Features](#)
- [Updates to the Privacy Policy](#)
- [Contact Us](#)

Our Comment to You

This Privacy Policy sets out how we collect, use, disclose, process and protect any information that you give us when you use our products and services located

at uk.shokz.com , fr.shokz.com , de.shokz.com , nl.shokz.com jp.shokz.com , om , shokz.com , ca.shokz.com , shokz.com.au and our applications.

Should we ask you to provide certain information by which you can be identified when using Shokz products and services, it will only be used in accordance with this Privacy Policy and/or our terms and Terms of Service.

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, as well as full confidence that ultimately, you have control of any personal information provided to Shokz.

In this Privacy Policy, **“personal information”** means information that can be used to directly or indirectly identify an individual, either from that information alone or from that information combined with other information Shokz has access to that individual. Such personal information may include, but not limited to the information you provide to us or upload, the information specific to you that may be

assigned by us (as defined in the “The Information We Collect and How We Use It” below)

By using Shokz products and services or other acting permitted by the applicable laws, you are deemed to have read, acknowledged and accepted all the provisions stated here in the Privacy Policy, including any changes we may make from time to time. In order to comply with General Data Protection Regulation (referred to as “GDPR”) in European Union, we will specifically seek prior explicit consent to the particular processing (e.g. automated individual decision-making) of special categories of personal data. Furthermore, we are committed to protecting the privacy, confidentiality and security of your personal information by complying with applicable laws, and we are equally committed to ensuring that all our employees and agents uphold these obligations.

If you have questions or concerns regarding our Privacy Policy or practices, please contact us at customer.service@shokz.com We will be happy to address them directly.

The Information We Collect and How We Use It

In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. If you do not provide your personal information, we may not be able to provide you with our products or services.

We will only collect the information that is necessary for its specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. We may collect the following types of information (which may or may not be personal information):

I.The Information We Collect

- **Information you provide to us or upload** (including your contact details): we may collect any and all personal information you provide to us. The types of data we collect directly from you include:
 - Name, address, email address, postcode, mobile phone number.

- Information about purchases or other transactions with us, such as product type, serial numbers, receipt information, shipping address.
- Information about your customer service and maintenance interactions with Us.
- If you choose to participate in Shokz marketing activities (including filling the online questionnaire,) related to our products and services, information provided in connection with such activities.
- User-generated content you provide to us which may be uploaded to our UK official website.
- Any other information you choose to directly provide to Shokz in connection with your use of the Services.
- **Location information** (only for specific services/functionalities): various types of information on your location (e.g. IP address) collected from your computer or mobile device when you provide your feedback through our Warranty Claim page on the website.
- **Location information** (only for specific services/functionalities): various types of information on your location (e.g. IP address) collected from your computer or mobile device when you access our Help Centre page on the website.

- **User behavior information:** information related to your use of certain functions, apps and websites by using cookies and other anonymous identifier technologies.
- **Device or SIM-related information** (only for specific services/functionality): information related to your device. For example, IP address, IMEI number.
- **Information specific to you that may be assigned by us:** we may collect and use information such as your account ID.
- **Information specific to you that may be assigned by Third Party Service Providers:** we may collect and use information such as your account ID assigned by Third Party Service Providers.
- **Information shared with us by third parties:** we may collect and use information such as your name, email, account information, payment methods, company and social network information.

II. How the Personal Information Can be Used

Personal information is collected for providing services and / or products to you, and legal compliance on our part under applicable laws. You hereby consent that we may process and disclose personal

information to Third-Party Service Providers (defined below) for the purposes stated in this Privacy Policy.

We may use your personal information for the following purposes:

- Providing, processing, maintaining, improving and developing our goods and/or services to you, including after-sales and customer support and for services on your device or through our websites.
- Communicating with you about your product, service or any general queries, such as updates, customer inquiry support, information about our events, notices.
- Conducting marketing related activities, such as providing marketing and promotional materials and updates. For more information on marketing and promotional activities, please refer to the Direct Marketing section below.
- Allowing you to post comments and provide feedback on our websites.
- Conducting promotional activities with third parties.
- Analysing and developing statistical information on the use of our products and services to better improve our products and services.

- Storing and maintaining information about you for our business operations or legal obligations.

Here are more details on how we use your information (which may include personal information):

- **Setting up your Account.** Personal information collected when creating an Account on our websites is used for creating the personal account and profile page for the user.
- **Processing your purchase orders.** Information relating to e-commerce orders may be used for processing the purchase order and related after-sales services, including customer support and re-delivery. In addition, the order number is used to cross check the order with the delivery partner as well as the actual delivery of the parcel. The receipt details, including name, address, phone number and postal code are for delivery purposes. The email address is used to send parcel tracking information to the user.
- **Collecting your feedback.** The feedback you choose to provide is valuable in helping AfterShokz make improvements to our services. In order to follow up on the feedback you have chosen to provide, AfterShokz may correspond with you using the personal information that you have provided and keep records.

- **Internet Protocol Reporting.** · When you use our websites, we collect your IP (Internet Protocol) address to monitor website traffic and to provide you with customised service. We use IP addresses to recommend services that are more appropriate for your country or region based on your traffic and geographic data. We do not collect IP addresses for the purpose of identifying users.
- **Conducting promotional activities.** ·If you enter into a contest, customer questionnaire and similar promotional activities, e.g. via our official Facebook page or other social media platforms, we may use the personal information you provided to administer those programs.
- **Provide marketing materials to you via email.** ·We may provide marketing materials to you relating to Shokz products and services via email after we obtain your prior explicit consent.
- **Conducting analysis of your device to provide a better user experience.** Shokz may conduct the analysis, so as to further improve the performance of our services.

Legal Bases for Use of Your Information

The legal bases for using your information as set out in this Privacy Policy are as follows:

- Where use of your information is necessary to perform our obligations under a contract with you (for example, to comply with: the Terms of Services of our websites which you accept by browsing the websites/registering; and/or our contract to provide our Services to you); or
- Where use of your information is necessary for our legitimate interests or the legitimate interests of others (for example, to provide security for our websites, products, applications; operate our business and our Services; ensure safe environments for our staff and visitors; make and receive payments; comply with legal requirements and defend our legal rights; prevent fraud and to know the customer to whom we are providing Services).
- Where we have your consent, in accordance with applicable legal requirements, to use your information for a particular purpose.
- Where we use your information to comply with applicable legal obligations (for example, keeping track of purchases for tax and auditing purposes).

- Other circumstances of personal information use only to the extent it is allowed explicitly under local data protection laws.

Direct Marketing

- We may use the email address to provide marketing materials to you relating to AfterShokz products and services.
- To provide better user experience, we may recommend the above-mentioned products, services and activities based on information about your purchase history, website browsing history, and location.
- We will only so use your personal data after we obtain your prior explicit consent and involve a clear affirmative action or indication of no objection in accordance with local data protection laws, which may require separate explicit consent. You have the right to opt out of our proposed use of your personal data for direct marketing by contacting us at customer.service@shokz.com. If you no longer wish to receive certain types of email communications, you may opt-out by following the unsubscribe link located at the bottom of each communication. We will not transfer your personal data to our

business partners for use by our business partners in direct marketing.

Cookies and Similar Technologies

- **Technologies:** cookies, tracking pixels and other similar technologies are used by Shokz and our Third-Party Service Providers, such as Facebook and Google. These technologies are used in analysing trends, administering the site, tracking users' movements around the website and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies only on an aggregated basis.
- **Advertising:** We partner with our Third-Party Service Providers to either display advertising to manage our advertising on other sites. Our Third-Party Service Provider may use technologies such as cookies to gather information about your activities on this site in order to provide you advertising based upon your browsing activities and interests. We will obtain your prior explicit consent and involve a clear affirmative action before providing this advertising service to you. If you wish to not have this information

used for the purpose of serving you interest-based ads, you may opt-out by contacting us at customer.service@shokz.com.

How We Share and Disclose Your Information

We may share information with Shokz affiliated companies, service providers who act on our behalf, our partners and our distributors, or other third parties at your direction. We disclose your personal information to provide the products or services that you have requested and enhance our services and your user experience.

Further, we promise that we do not sell any personal information to third parties.

In order to conduct business operations smoothly in providing you with the full capabilities of our products and services, we may disclose your personal information from time to time to our third-party service providers which are our delivery service providers, affiliate program service provider, customer service providers like Zendesk, advertising and marketing service providers like Klaviyo and distributors (together referred to as "Third-Party Service Providers") acting on behalf of Shokz.

In each case described in this section, you can be assured that Shokz will only share your personal information in accordance with your consent. Your consent to Shokz will engage sub-processors for the processing of your personal information. You should know that when Shokz shares your personal information with a Third-Party Service Provider under any circumstance described in this section, Shokz will contractually specify that the third party is subject to practices and obligations to comply with applicable local data protection laws. Shokz will contractually ensure compliance by any Third-Party Service Providers with the privacy standards that apply to them in your home jurisdiction.

Such Third-Party Service Providers would be processing your personal information on our behalf or for one or more of the purposes listed above. If you no longer wish to allow us to share this information, please contact us at customer.service@shokz.com.

Security Safeguards

We are committed to ensuring that your personal information is secure. In order to prevent unauthorized access, disclosure or other

similar risks, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect on Shokz websites and on your mobile application. We will use all reasonable efforts to safeguard your personal information.

All your personal information is stored on secure servers that are protected in controlled facilities. We classify your data based on importance and sensitivity, and ensure that your personal information has the highest security level. We make sure that our employees and Third-Party Service Providers who access the information to help provide you with our products and services are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet such obligations. We have special access controls for cloud-based data storage as well. All in all, we regularly review our information collection, storage and processing practices, including physical security measures, to guard against any unauthorized access and use.

We will take all practicable steps to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure, and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

We will take upon the personal data breach, notifying the breach to the relevant supervisory authority or under some circumstances, notifying the personal data breach to the data subjects by complying with applicable laws, including your local data protection legislation.

Retention of Your Information

Personal information will be held for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain personal information, or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal information was collected is no longer being served by retention of the personal information. If further processing is for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes according to the applicable laws, the data can be further retained by Shokz even if further processing is incompatible with original purposes.

Data Subject Rights and Your Choices

Shokz recognizes that privacy concerns differ from person to person. Therefore, we provide examples of ways Shokz makes available for you to choose to restrict the collection, use, disclosure or processing of your personal information.

I. Access, update, correct, erase or restrict processing your personal information

- You have the right to request access to and/or correction of any other personal information that we hold about you. When you update your personal information, you will be asked to verify your identity before we proceed with your request. Once we obtain sufficient information to accommodate your request for access to or correction of your personal information, we shall proceed to respond to your request within any timeframe set out under your applicable data protection laws.

- A copy of your personal data collected and processed by us will be provided to you upon your request free of charge. For any extra request of the same information, we may charge a reasonable fee based on actual administrative costs according to the applicable laws.
- If you would like to request access to your personal data held by us or if you believe any information we are holding on you is incorrect or incomplete, please contact us at customer.service@shokz.com
- You have the right to obtain from us the erasure of your personal information. We shall consider the grounds regarding your erasure request and take reasonable steps, including technical measures, if the grounds apply to GDPR.
- You have the right to obtain from us the restriction of processing your personal information. We shall consider the grounds regarding your restriction request. If the grounds apply to GDPR, we shall only process your personal information under applicable circumstances in GDPR and inform you before the restriction of processing is lifted.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

- You have the right to receive your personal information in a structured, commonly used format and transmit the information to another data controller.

II. Withdrawal of consent

- You may withdraw your consent for the collection, use and/or disclosure of your personal information in our possession or control by submitting a request. This may be done by contacting us at customer.service@shokz.com. We will process your request within a reasonable time from when the request was made, and thereafter not collect, use and/or disclose your personal information as per your request.
- Please recognize that your withdrawal of consent could result in certain legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that you will not be able to enjoy Shokz's products and services.

III. Responding to your above request

- To ensure security, you may need to provide a written request or prove your identity in other ways. We may ask you to verify your identity before processing your request.
- We will respond within the time limit specified by applicable laws. For your reasonable request, we do not charge a fee in principle, but for repeated requests that exceed a reasonable limit, we will charge a fee as appropriate. We may refuse to respond to your requests for information that is not directly related to your identity, unreasonable duplication of information, or excessive technical means (for example, the need to develop a new system or fundamentally change the current practice), bring risks to the legitimate rights and interests of others, or unrealistic requests.

Additional Information for Certain Jurisdictions

I. Information for California residents

California Consumer Privacy Act (hereinafter referred to as "CCPA") requires us to provide California residents with some additional

information regarding the rights to "personal information" without discrimination.

- Rights of Data Access and Deletion

The CCPA allows California residents to make certain requests about your personal information, including allowing you to request us to:

- 1. Inform you about the categories of personal information we collect or disclose about you; the categories of third parties with whom we share/disclose personal information; the categories of sources of such information.
 2. Provide access to and/or a copy of your information we hold about you.
 3. Delete your personal information.
 4. Provide you with information about the financial incentives that we offer to you, if any.

Please note that the CCPA requires us to fulfil obligations when "sell" personal information to third parties. We do not engage in such activity and have not engaged in such

activity in the past twelve months from the effective date of this Privacy Policy.

To ensure security, you may need to provide a written request or prove your identity in other ways. We may ask you to verify your identity before processing your request.

- California "Shine the Light" Disclosure

The California "Shine the Light" law gives residents of California the right to opt out of the sharing of certain categories of personal information with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

If you have any comments or questions regarding your legal rights above, please send an email to hello@shokz.com or call 737-215-4011.

II. Information for Nevada residents

If you are a Nevada resident who has purchased goods or services from us, you have the right to opt out of the "sale" of "covered information" (includes first and last name, address, email address, and phone number as defined in Nevada law) by sending an email

to hello@shokz.com or call 737-215-4011. We may take reasonable steps to verify your identity and the authenticity of the request.

Transfer of Personal Information Outside of Your Jurisdiction

- Shokz stores data on secured servers in several countries around the world. Please be aware that the data controller may differ depending on where you live, and the information you provide to us or we obtain as a result of your use of this Sites may be processed and transferred to countries other than the country where you domicile.
- For example, if you reside in the EU, to provide delivery and after-sales services, we may need to transfer your personal information to our Shokz family of companies, Third-Party Service Providers, or other business partners, who may be located in a country or area outside the EU. We will do so on the basis of EU standard contractual clauses or any other safeguards under the GDPR.
- In particular, we will ensure that all transfers will be in accordance this Privacy Policy and your local applicable local data protection laws, including the GDPR and CCPA, by putting in

place appropriate safeguards. You will have the right to be informed of the appropriate safeguards taken by Shokz for this transfer of your personal information.

Children's Privacy

We consider it the responsibility of parents to monitor their children's (at the age under 18 years old or the equivalent age as specified by law in your jurisdiction) use of our products and services.

Nevertheless, it is our policy not to require personal information from children or offer to send any promotional materials to persons in that category.

Shokz does not seek or intend to seek to receive any personal information from minors. Should a parent or guardian have reasons to believe that a minor has provided Shokz with personal information without their prior consent, please contact us by sending an email to customer.service@shokz.com to ensure that the personal information is removed and the minor unsubscribes from the website and any of the Shokz mobile application or software.

Third-Party Links and Features

Our Privacy Policy does not apply to products and services offered by a third party. Shokz products and services may include third parties' products, services and links to third parties' websites. When you use such products or services, they may collect your information too. For this reason, we strongly suggest that you read the third party's privacy policy as you have taken time to read ours. We are not responsible for and cannot control how third parties use personal information that they collect from you. Our Privacy Policy does not apply to other sites linked from our services.

In order to be able to offer you Klarna's payment options, we will pass to Klarna certain aspects of your personal information, such as contact and order details, in order for Klarna to assess whether you qualify for their payment options and to tailor the payment options for you. General information on Klarna you can find [here](#). Your personal data is handled in accordance with applicable data protection law and in accordance with the information in [Klarna's privacy policy](#).

Updates to the privacy policy

We keep our Privacy Policy under regular review and may update this Privacy Policy to reflect changes to our information practices. In that case, the 'effective date' at the top of this page will also change. We encourage you to periodically review this page for the latest information on our privacy practices. By continuing use of products and services on the websites, applications or software, you are confirming that you have read and understood the latest version of Privacy Policy. We will seek your fresh consent before we collect more personal information from you or when we wish to use or disclose your personal information for new purposes. When there is a material change to this Privacy Policy, we will take reasonable steps to let you know.

Contact us

If you have any comments or questions about this Privacy Policy or any questions relating to our collection, use or disclosure of your personal information, please contact us at customer.service@shokz.com, or give your feedback through our Contact Us page on the website.

In addition, Shokz set up a Data Protection Officer (DPO) in charge the data protection under GDPR, and the contact of DPO is privacy@shokz.com.

In addition, we have several data controllers, which are Shokz family of companies taking primary responsibility for the collection and processing of personal information under this Privacy Policy. The data controllers are listed below:

- If you live in the United States or Canada, the data controller for your information is AfterShokz LLC, 3200 Gracie Kiltz Lane, Suite 300 Austin, TX 78758, The USA.
- If you live in Mainland China, the data controller for your information is Shenzhen Shokz Co., Ltd., Floors 1-4, Factory Building 26, Shancheng Industrial Park, Shixin Community, Langxin Community, Shiyuan Street, Bao'an District, Shenzhen, Guangdong, China.
- If you live in a country in the European Economic Area (EEA), the United Kingdom or Switzerland, the data controller for your information is AfterShokz Euro B.V., Schipholweg 103, 2316XC Leiden, The Netherlands.

- If you live anywhere else, the data controller for your information is Shokz Holding Limited, Room 2603A, 26/F., Tower 1, Lippo Centre, 89 Queensway, Admiralty, Hong Kong, China.

Thank you for taking the time to understand our Privacy Policy!

Shokz Privacy Policy(Australia)

Effective date: 1st August, 2022

INTRODUCTION

Shokz Holding Limited, AfterShokz Euro B.V., Shenzhen Shokz Co., Ltd., AfterShokz LLC and its affiliated companies under common ownership and control within the Shokz family of companies (collectively, "Shokz", "we", "our" or "us") respect the privacy of the viewer/visitor/user ("you"). Your privacy is important to Shokz so we've developed this Privacy Policy. We have revamped the Privacy Policy front and back so that from the effective date onwards, this Privacy Policy can provide privacy details on how we manage your personal information for all Shokz products and services, unless a separate privacy policy is provided for a specific Shokz product or service.

This Privacy Policy contains the following sections:

- [Our Comment to You](#)
- [The Information We Collect and How We Use It](#)
- [Legal Bases for Use of Your Information](#)
- [Direct Marketing](#)
- [Cookies and Similar Technologies](#)
- [How We Share and Disclose Your Information](#)
- [Security Safeguards](#)
- [Retention of Your Information](#)
- [Data Subject Rights and Your Choices](#)
- [Additional Information for Certain Jurisdictions](#)
- [Transfer of Personal Information Outside of Your Jurisdiction](#)
- [Children's Privacy](#)
- [Third-Party Links and Features](#)
- [Updates to the Privacy Policy](#)
- [Contact Us](#)

Our Commitment to You

This Privacy Policy sets out how we collect, use, disclose, process and protect any information that you give us when you use our products and services located

at uk.shokz.com , fr.shokz.com , de.shokz.com , nl.shokz.com jp.shokz.com , om , shokz.com , ca.shokz.com , shokz.com.au and our applications.

Should we ask you to provide certain information by which you can be identified when using Shokz products and services, it will only be used in accordance with this Privacy Policy and/or our terms and Terms of Service.

The Privacy Policy is designed with you in mind, and it is important that you have a comprehensive understanding of our personal information collection and usage practices, as well as full confidence that ultimately, you have control of any personal information provided to Shokz.

In this Privacy Policy, **“personal information”** means information that can be used to directly or indirectly identify an individual, either from that information alone or from that information combined with other information Shokz has access to that individual. Such personal information may include, but not limited to the information you provide to us or upload, the information specific to you that may be assigned by us (as defined in the “The Information We Collect and How We Use It” below)

By using Shokz products and services or other acting permitted by the applicable laws, you are deemed to have read, acknowledged

and accepted all the provisions stated here in the Privacy Policy, including any changes we may make from time to time. In order to comply with General Data Protection Regulation (referred to as “GDPR”) in European Union, we will specifically seek prior explicit consent to the particular processing (e.g. automated individual decision-making) of special categories of personal data. Furthermore, we are committed to protecting the privacy, confidentiality and security of your personal information by complying with applicable laws, and we are equally committed to ensuring that all our employees and agents uphold these obligations.

If you have questions or concerns regarding our Privacy Policy or practices, please contact us at customer.service@shokz.com We will be happy to address them directly.

The Information We Collect and How We Use It

In order to provide our services to you, we will ask you to provide personal information that is necessary to provide those services to you. If you do not provide your personal information, we may not be able to provide you with our products or services.

We will only collect the information that is necessary for its specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes. We may collect the following types of information (which may or may not be personal information):

The Information We Collect

- **Information you provide to us or upload**(including your contact details): we may collect any and all personal information you provide to us. The types of data we collect directly from you include:
 - Name, address, email address, postcode, mobile phone number.
 - Information about purchases or other transactions with us, such as product type, serial numbers, receipt information, shipping address.
 - Information about your customer service and maintenance interactions with us.

- If you choose to participate in Shokz marketing activities (including filling the online questionnaire,) related to our products and services, information provided in connection with such activities.
- User-generated content you provide to us which may be uploaded to our UK official website.
- Any other information you choose to directly provide to Shokz in connection with your use of the Services.
- **Location information** (only for specific services/functionalities): various types of information on your location (e.g. IP address) collected from your computer or mobile device when you provide your feedback through our Warranty Claim page on the website.
- **Location information** (only for specific services/functionalities): various types of information on your location (e.g. IP address) collected from your computer or mobile device when you access our Help Centre page on the website.
- **User behavior information:** information related to your use of certain functions, apps and websites by using cookies and other anonymous identifier technologies.

- **Device or SIM-related information** (only for specific services/functionalities): information related to your device. For example, IP address, IMEI number.
- **Information specific to you that may be assigned by us:** we may collect and use information such as your account ID.
- **Information specific to you that may be assigned by Third Party Service Providers:** we may collect and use information such as your account ID assigned by Third Party Service Providers.

How the Personal Information Can be Used

Personal information is collected for providing services and / or products to you, and legal compliance on our part under applicable laws. You hereby consent that we may process and disclose personal information to Third-Party Service Providers (defined below) for the purposes stated in this Privacy Policy.

We may use your personal information for the following purposes:

- Providing, processing, maintaining, improving and developing our goods and/or services to you, including after-sales and customer support and for services on your device or through our websites.

- Communicating with you about your product, service or any general queries, such as updates, customer inquiry support, information about our events, notices.
- Conducting marketing related activities, such as providing marketing and promotional materials and updates. For more information on marketing and promotional activities, please refer to the Direct Marketing section below.
- Allowing you to post comments and provide feedback on our websites.
- Conducting promotional activities with third parties.
- Analyzing and developing statistical information on the use of our products and services to better improve our products and services.
- Storing and maintaining information about you for our business operations or legal obligations.

Here are more details on how we use your information (which may include personal information):

- **Setting up your Account.** Personal information collected when creating an Account on our websites is used for creating the personal account and profile page for the user.

- **Processing your purchase orders.** Information relating to e-commerce orders may be used for processing the purchase order and related after-sales services, including customer support and re-delivery. In addition, the order number is used to cross check the order with the delivery partner as well as the actual delivery of the parcel. The receipt details, including name, address, phone number and postal code are for delivery purposes. The email address is used to send parcel tracking information to the user.
- **Collecting your feedback.** The feedback you choose to provide is valuable in helping Shokz make improvements to our services. In order to follow up on the feedback you have chosen to provide, Shokz may correspond with you using the personal information that you have provided and keep records.
- **Internet Protocol Reporting.** When you use our websites, we collect your IP (Internet Protocol) address to monitor website traffic and to provide you with customised service. We use IP addresses to recommend services that are more appropriate for your country or region based on your traffic and geographic data. We do not collect IP addresses for the purpose of identifying users.

- **Conducting promotional activities.** If you enter into a contest, customer questionnaire and similar promotional activities, e.g. via our official Facebook page or other social media platforms, we may use the personal information you provided to administer those programs.
- **Provide marketing materials to you via email.** We may provide marketing materials to you relating to Shokz products and services via email after we obtain your prior explicit consent.
- **Conducting analysis of your device to provide a better user experience.** Shokz may conduct the analysis, so as to further improve the performance of our services.

Legal Bases for Use of Your Information

The legal bases for using your information as set out in this Privacy Policy are as follows:

- Where use of your information is necessary to perform our obligations under a contract with you (for example, to comply with: the Terms of Services of our websites which you accept by browsing the websites/registering; and/or our contract to provide our Services to you); or

- Where use of your information is necessary for our legitimate interests or the legitimate interests of others (for example, to provide security for our websites, products, applications; operate our business and our Services; ensure safe environments for our staff and visitors; make and receive payments; comply with legal requirements and defend our legal rights; prevent fraud and to know the customer to whom we are providing Services).
- Where we have your consent, in accordance with applicable legal requirements, to use your information for a particular purpose.
- Where we use your information to comply with applicable legal obligations (for example, keeping track of purchases for tax and auditing purposes).
- Other circumstances of personal information use only to the extent it is allowed explicitly under local data protection laws.

Direct Marketing

- We may use the email address to provide marketing materials to you relating to AfterShokz products and services.
- To provide better user experience, we may recommend the above-mentioned products, services and activities based on

information about your purchase history, website browsing history, and location.

- We will only so use your personal data after we obtain your prior explicit consent and involve a clear affirmative action or indication of no objection in accordance with local data protection laws, which may require separate explicit consent. You have the right to opt out of our proposed use of your personal data for direct marketing by contacting us at customer.service@shokz.com. If you no longer wish to receive certain types of email communications, you may opt-out by following the unsubscribe link located at the bottom of each communication. We will not transfer your personal data to our business partners for use by our business partners in direct marketing.

Cookies and Similar Technologies

- **Technologies:** cookies, tracking pixels and other similar technologies are used by Shokz and our Third-Party Service Providers, such as Facebook and Google. These technologies are used in analysing trends, administering the site, tracking users' movements around the website and to gather demographic

information about our user base as a whole. We may receive reports based on the use of these technologies by these companies only on an aggregated basis.

- **Advertising:**We partner with our Third-Party Service Providers to either display advertising to manage our advertising on other sites. Our Third-Party Service Provider may use technologies such as cookies to gather information about your activities on this site in order to provide you advertising based upon your browsing activities and interests. We will obtain your prior explicit consent and involve a clear affirmative action before providing this advertising service to you. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by contacting us at customer.service@shokz.com.

How We Share and Disclose Your Information

We may share information with Shokz affiliated companies, service providers who act on our behalf, our partners and our distributors, or other third parties at your direction. We disclose your personal information to provide the products or services that you have requested and enhance our services and your user experience.

Further, we promise that we do not sell any personal information to third parties.

In order to conduct business operations smoothly in providing you with the full capabilities of our products and services, we may disclose your personal information from time to time our third-party service providers which are our delivery service providers, customer service providers like Zendesk, advertising and marketing service providers like Klaviyo and distributors (together referred to as “Third-Party Service Providers”) acting on behalf of Shokz.

In each case described in this section, you can be assured that Shokz will only share your personal information in accordance with your consent. Your consent to Shokz will engage sub-processors for the processing of your personal information. You should know that when Shokz shares your personal information with a Third-Party Service Provider under any circumstance described in this section, Shokz will contractually specify that the third party is subject to practices and obligations to comply with applicable local data protection laws. Shokz will contractually ensure compliance by any Third-Party Service Providers with the privacy standards that apply to them in your home jurisdiction.

Such Third-Party Service Providers would be processing your personal information on our behalf or for one or more of the purposes listed above. If you no longer wish to allow us to share this information, please contact us at customer.service@shokz.com.

Security Safeguards

We are committed to ensuring that your personal information is secure. In order to prevent unauthorized access, disclosure or other similar risks, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect on Shokz websites and on your mobile application. We will use all reasonable efforts to safeguard your personal information.

All your personal information is stored on secure servers that are protected in controlled facilities. We classify your data based on importance and sensitivity, and ensure that your personal information has the highest security level. We make sure that our employees and Third-Party Service Providers who access the information to help provide you with our products and services are subject to strict contractual confidentiality obligations and may be

disciplined or terminated if they fail to meet such obligations. We have special access controls for cloud-based data storage as well. All in all, we regularly review our information collection, storage and processing practices, including physical security measures, to guard against any unauthorized access and use.

We will take all practicable steps to safeguard your personal information. However, you should be aware that the use of the Internet is not entirely secure, and for this reason we cannot guarantee the security or integrity of any personal information which is transferred from you or to you via the Internet.

We will take upon the personal data breach, notifying the breach to the relevant supervisory authority or under some circumstances, notifying the personal data breach to the data subjects by complying with applicable laws, including your local data protection legislation.

Retention of Your Information

Personal information will be held for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by

applicable laws. We shall cease to retain personal information, or remove the means by which the personal information can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal information was collected is no longer being served by retention of the personal information. If further processing is for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes according to the applicable laws, the data can be further retained by Shokz even if further processing is incompatible with original purposes.

Data Subject Rights and Your Choices

Shokz recognizes that privacy concerns differ from person to person. Therefore, we provide examples of ways Shokz makes available for you to choose to restrict the collection, use, disclosure or processing of your personal information.

I. Access, update, correct, erase or restrict processing your personal information

- You have the right to request access to and/or correction of any other personal information that we hold about you. When you update your personal information, you will be asked to verify your identity before we proceed with your request. Once we obtain sufficient information to accommodate your request for access to or correction of your personal information, we shall proceed to respond to your request within any timeframe set out under your applicable data protection laws.
- A copy of your personal data collected and processed by us will be provided to you upon your request free of charge. For any extra request of the same information, we may charge a reasonable fee based on actual administrative costs according to the applicable laws.
- If you would like to request access to your personal data held by us or if you believe any information we are holding on you is incorrect or incomplete, please contact us at customer.service@shokz.com
- You have the right to obtain from us the erasure of your personal information. We shall consider the grounds regarding

your erasure request and take reasonable steps, including technical measures, if the grounds apply to GDPR.

- You have the right to obtain from us the restriction of processing your personal information. We shall consider the grounds regarding your restriction request. If the grounds apply to GDPR, we shall only process your personal information under applicable circumstances in GDPR and inform you before the restriction of processing is lifted.
- You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- You have the right to receive your personal information in a structured, commonly used format and transmit the information to another data controller.

II. Withdrawal of consent

- You may withdraw your consent for the collection, use and/or disclosure of your personal information in our possession or control by submitting a request. This may be done by contacting us at customer.service@shokz.com. We will process your request within a reasonable time from when the request was made, and

thereafter not collect, use and/or disclose your personal information as per your request.

- Please recognize that your withdrawal of consent could result in certain legal consequences. Depending on the extent of your withdrawal of consent for us to process your personal information, it may mean that you will not be able to enjoy Shokz's products and services.

III.Responding to your above request

- To ensure security, you may need to provide a written request or prove your identity in other ways. We may ask you to verify your identity before processing your request.
- We will respond within the time limit specified by applicable laws. For your reasonable request, we do not charge a fee in principle, but for repeated requests that exceed a reasonable limit, we will charge a fee as appropriate. We may refuse to respond to your requests for information that is not directly related to your identity, unreasonable duplication of information, or excessive technical means (for example, the need to develop a new system or fundamentally change the current practice), bring

risks to the legitimate rights and interests of others, or unrealistic requests.

Additional Information for Certain Jurisdictions

I. Information for California residents

California Consumer Privacy Act (hereinafter referred to as "CCPA") requires us to provide California residents with some additional information regarding the rights to "personal information" without discrimination.

- Rights of Data Access and Deletion

The CCPA allows California residents to make certain requests about your personal information, including allowing you to request us to:

- 1. Inform you about the categories of personal information we collect or disclose about you; the categories of third parties with whom we share/disclose

personal information; the categories of sources of such information.

2. Provide access to and/or a copy of your information we hold about you.
3. Delete your personal information.
4. Provide you with information about the financial incentives that we offer to you, if any.

Please note that the CCPA requires us to fulfil obligations when “sell” personal information to third parties. We do not engage in such activity and have not engaged in such activity in the past twelve months from the effective date of this Privacy Policy.

To ensure security, you may need to provide a written request or prove your identity in other ways. We may ask you to verify your identity before processing your request.

- California "Shine the Light" Disclosure

The California "Shine the Light" law gives residents of California the right to opt out of the sharing of certain categories of personal information with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

If you have any comments or questions regarding your legal rights above, please send an email to hello@shokz.com or call 737-215-4011.

II. Information for Nevada residents

If you are a Nevada resident who has purchased goods or services from us, you have the right to opt out of the "sale" of "covered information" (includes first and last name, address, email address, and phone number as defined in Nevada law) by sending an email to hello@shokz.com or call 737-215-4011. We may take reasonable steps to verify your identity and the authenticity of the request.

Transfer of Personal Information Outside of Your Jurisdiction

- Shokz stores data on secured servers in several countries around the world. Please be aware that the data controller may differ depending on where you live, and the information you provide to us or we obtain as a result of your use of this Sites may be processed and transferred to countries other than the country where you domicile.

- For example, if you reside in the EU, to provide delivery and after-sales services, we may need to transfer your personal information to our Shokz family of companies, Third-Party Service Providers, or other business partners, who may be located in a country or area outside the EU. We will do so on the basis of EU standard contractual clauses or any other safeguards under the GDPR.
- In particular, we will ensure that all transfers will be in accordance with this Privacy Policy and your local applicable local data protection laws, including the GDPR and CCPA, by putting in place appropriate safeguards. You will have the right to be informed of the appropriate safeguards taken by Shokz for this transfer of your personal information.

Children's Privacy

We consider it the responsibility of parents to monitor their children's (at the age under 18 years old or the equivalent age as specified by law in your jurisdiction) use of our products and services.

Nevertheless, it is our policy not to require personal information from children or offer to send any promotional materials to persons in that category.

Shokz does not seek or intend to seek to receive any personal information from minors. Should a parent or guardian have reasons to believe that a minor has provided Shokz with personal information without their prior consent, please contact us by sending an email to customer.service@shokz.com to ensure that the personal information is removed and the minor unsubscribes from the website and any of the Shokz mobile application or software.

Third-Party Links and Features

Our Privacy Policy does not apply to products and services offered by a third party. Shokz products and services may include third parties' products, services and links to third parties' websites. When you use such products or services, they may collect your information too. For this reason, we strongly suggest that you read the third party's privacy policy as you have taken time to read ours. We are not responsible for and cannot control how third parties use personal information that they collect from you. Our Privacy Policy does not apply to other sites linked from our services.

Updates to the privacy policy

We keep our Privacy Policy under regular review and may update this Privacy Policy to reflect changes to our information practices. In that case, the 'effective date' at the top of this page will also change. We encourage you to periodically review this page for the latest information on our privacy practices. By continuing use of products and services on the websites, applications or software, you are confirming that you have read and understood the latest version of Privacy Policy. We will seek your fresh consent before we collect more personal information from you or when we wish to use or disclose your personal information for new purposes. When there is a material change to this Privacy Policy, we will take reasonable steps to let you know.

Contact us

If you have any comments or questions about this Privacy Policy or any questions relating to our collection, use or disclosure of your personal information, please contact us at customer.service@shokz.com, or give your feedback through our Contact Us page on the website.

In addition, Shokz set up a Data Protection Officer (DPO) in charge the data protection under GDPR, and the contact of DPO is privacy@shokz.com.

In addition, we have several data controllers, which are Shokz family of companies taking primary responsibility for the collection and processing of personal information under this Privacy Policy. The data controllers are listed below:

- If you live in the United States or Canada, the data controller for your information is AfterShokz LLC, 3200 Gracie Kiltz Lane, Suite 300 Austin, TX 78758, The USA.
- If you live in Mainland China, the data controller for your information is Shenzhen Shokz Co., Ltd., Floors 1-4, Factory Building 26, Shancheng Industrial Park, Shixin Community, Langxin Community, Shiyuan Street, Bao'an District, Shenzhen, Guangdong, China.
- If you live in a country in the European Economic Area (EEA), the United Kingdom or Switzerland, the data controller for your information is AfterShokz Euro B.V., Schipholweg 103, 2316XC Leiden, The Netherlands.

- If you live anywhere else, the data controller for your information is Shokz Holding Limited, Room 2603A, 26/F., Tower 1, Lippo Centre, 89 Queensway, Admiralty, Hong Kong, China.

Thank you for taking the time to understand our Privacy Policy!