

Privacy Policy For Cobite, INC.

This policy statement describes Cobite Inc.'s privacy policy and practices. Cobite complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the [United States Department of Commerce](#) for the collection, use and retention of personal information from the European Union countries and Switzerland.

Cobite has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access and Recourse, Enforcement and Liability.

This privacy policy applies to all personal information received by Cobite in the United States from the European Union countries and from Switzerland.

If there is any conflict between the terms in this Policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern.

For purposes of ensuring compliance with the Privacy Shield Framework Cobite is subject to the investigatory and enforcement authority of the of the U.S. Federal Trade Commission (FTC).

Personal Information Collected and its Intended Use

Cobite provides full life cycle wireless expense management services to corporate clients covering the mobile devices for which the corporations are responsible.

What We Collect

Cobite acquires pertinent employee information from its customers in its performance of its services. The types of personal information collected may include (but are not limited to):

- Employee Identification Number
- First and Last Name
- Job Title
- Corporate Email Address
- Business Unit
- Corporate Phone Numbers
- Office Location

In addition we receive Mobile Carrier Invoice data that includes detail records of corporate owned mobile device usage.

How the Data is Used

The data maintained by Cobite in its databases and servers is only provided to authorized employees and agents of its customers for the explicit purpose of managing, tracking and controlling the corporate wireless expense. The information is also provided to authorized customer staff to facilitate the tracking and management of the procurement, provisioning, disposal and use of its corporately liable wireless mobile devices.

Cobite provides usage detail information to customer's legal & compliance departments upon request.

The invoice and billing data collected is used in combination with the inventory of mobile devices and users for validating and allocating expenses and to facilitate the payment of carrier and vendor invoiced charges.

Sharing the Personal Information with Third Parties

Cobite does not provide customer employee personal data or any mobile usage detail data to any third parties. Cobite reserves the right to disclose private personal data in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

In the event that any personal information should be transferred to a third party Cobite will be liable for the use of personal information that is inconsistent with the Privacy Shield Principles.

Integrity of the Data

Cobite regularly updates and verifies the integrity and consistency of the data that it acquires against data sources provided and updated by the customer, and/or provides access to customer employees to view, change or correct their own personal data.

Access to Personal Data

Individuals have the right to know what personal data Cobite collects and maintains. Individuals may, upon request to Cobite access and review their personal data to ensure that such personal data is accurate and relevant and can correct, erase or block any data that is incorrect.

If you wish to correct, amend or delete personal information we hold about you please submit a written request to the address provided below.

Data Retention

Cobite retains the data we collect as long as needed to provide the services to our client.

Cobite's Public Website

Any party may access Cobite's public websites without providing personal information. Cobite maintains logs of IP addresses that access the web site and associates this data with which web pages were accessed. The information collected is stored and used for monitoring and control purposes.

Data Security

Cobite employs reasonable and industry generally accepted practices to secure and protect customer information it stores and maintains from unauthorized access, disclosure, alteration, misuse, loss and destruction.

Cobite provides a hosted and managed service on secure servers located in physically secure data centers. Access to the data centers is restricted to Cobite authorized personnel.

Access to customer information is controlled and restricted through the use of client user specific unique log in and passwords. All servers are protected by secure firewalls and authorized customer employees are restricted to accessing only their own corporate data. All access to customer data, including Cobite internal access is monitored by Cobite's technical staff. Cobite and its customers enter into confidentiality agreements which require that care and precautions be taken to prevent loss, misuse, or disclosure of personal information.

Enforcement

Cobite performs regular internal reviews to ensure that customer data is maintained in a manner consistent with this policy and the Privacy Shield Framework. Cobite uses a self assessment approach to assuring that the policy is accurate, comprehensive for its intended purpose, prominently displayed and accessible.

Any employee found to have violated this policy will be subject to disciplinary action which can result in termination of employment. Cobite is committed to resolving and correcting any identified deficiencies with its privacy policy to ensure compliance with the Privacy Shield principles.

Complaints

Cobite is committed to resolve any personal data privacy complaint to ensure its compliance with the Privacy Shield Principles. Cobite encourages interested or affected person to raise any concerns with this policy or its implementation by contacting Cobite at:

Cobite, Inc.
48 Wall Street
Suite 1100
New York, NY 10005
U.S.A.
Attn: Robert Lippman
OfficeOfPrivacyEnforcement@cobite.com

For any suspected violations of this policy please include a description of the violation and if applicable, the time frame in which the reported violation occurred along with your contact information. Cobite takes privacy concerns very seriously and we will investigate any reported violation promptly and thoroughly.

Cobite also commits to refer unresolved privacy complaints under the Privacy Shield Principles to an independent third party dispute resolution body.

Cobite has registered and agreed to use JAMS as its dispute resolution provider. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed by Cobite, please visit the [JAMS Privacy Shield website](#) for more information or to file a complaint.

Under certain circumstances if your complaint has not been satisfactorily resolved and as a last resort you have the right to select binding arbitration through the Privacy Shield Panel to redress your complaint.