

PRIVACY POLICY
Effective: January 1st, 2019

1. Scope. This policy applies to any users of the services of Pack Leaders Inc., doing business as “Pack Leaders ATL” (“Pack Leaders ATL”) or its affiliates anywhere in the world, and to anyone else who contacts Pack Leaders ATL or otherwise submits information to Pack Leaders ATL, unless noted below. This includes those who use Pack Leaders ATL or its affiliates’ services to request or receive services (users) and any other user of Pack Leaders ATL’s services (including apps, websites and API), and anyone else who contacts Pack Leaders ATL or otherwise submits information to Pack Leaders ATL, unless subject to a separate privacy policy, notice or agreement. This Privacy Policy describes our global practices regarding the collection, use, and sharing of data about identified or identifiable individuals (“Personal Information”) though the services offered by Pack Leaders ATL (“the Services”).

2. Data Controller. Pack Leaders ATL is a “data controller” for the purposes of the General Data Protection Regulation 2016 which means that we are responsible for, and control the processing of, your Personal Information. By using, the Services you indicate that you acknowledge and understand the policies and practices contained in this Privacy Policy.

3. The Information We Collect. Pack Leaders ATL collects information that you provide to Pack Leaders ATL, when you create your Pack Leaders ATL account; information created when you use our services, such as location, usage and device information and information from other sources, such as Pack Leaders ATL partners and third parties that use Pack Leaders ATL’s API.

a. Information you provide - this includes: information submitted when you create or update your Pack Leaders ATL account, which depending on your location and the Pack Leaders ATL services you use may include your name, email, phone number, login name and password, birth date, home address, home access information, payment information, pet information, veterinarian information, other pet information and photos; requests for services through the Pack Leaders ATL app or website; contacts with Pack Leaders ATL, including for customer support; and surveys sent to and received from you by Pack Leaders ATL or on behalf of Pack Leaders ATL.

b. Information created when you use our services - this includes:

(i) Location Information - depending on the Pack Leaders ATL services that you use, and your app settings or device permissions, Pack Leaders ATL may collect your precise or approximate location information as determined through data such as GPS, IP address and WiFi. Users may use the Pack Leaders ATL app without enabling Pack Leaders ATL to collect their location information. However, this may affect the functionality available on your Pack Leaders ATL app.

(ii) Transaction Information - we collect transaction details related to your use of our services, including the type of services you requested or provided, date and time the service was provided, amount charged, and other related transaction details. Additionally, if someone uses your account, we may associate your name with that person.

(iii) Usage and Preference Information -We collect information about how you interact with our services, preferences expressed, and settings chosen. In some cases, we do this through the use of cookies, pixel tags, and similar technologies that create and maintain unique identifiers.

(iv) Device Information - We may collect information about the devices you use to access our services, including the hardware models, operating systems and versions, software, file names and versions, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion information, and mobile network information.

(v) Log Information - When you interact with our services, we collect server logs, which may include information like device IP address, access dates and times, app

features or pages viewed, app crashes and other system activity, type of browser, and the third-party site or service you were using before interacting with our services.

c. Information from other sources - These may include: users providing feedback, such as ratings or compliments, social media services, or apps or websites who use Pack Leaders ATL's APIs or whose API Pack Leaders ATL uses; publicly available sources and marketing service providers.

Pack Leaders ATL may combine the information collected from these sources with other information in its possession.

4. How We Use Your Information. We collect and use information to improve the services we offer. We use the information we collect for purposes including:

a. Providing services and features - Pack Leaders ATL uses the information we collect to provide, personalize, maintain and improve our products and services. This includes using the information to enable services; enable features to personalize your Pack Leaders ATL account; perform internal operations necessary to provide our services, including to troubleshoot software bugs and operational problems, to conduct data analysis, testing, and research, and to monitor and analyze usage and activity trends.

b. Safety and security - We use your data to help maintain the safety, security and integrity of our services.

c. Customer support - Pack Leaders ATL uses the information we collect (including recordings of customer support calls after notice to you and with your consent) to assist you when you contact our customer support services, including to direct your questions to the appropriate customer support person; investigate and address your concerns and monitor and improve our customer support responses.

d. Research and development - We may use the information we collect for testing, research, analysis and product development. This allows us to improve and enhance the safety and security of our services, develop new features and products.

e. Legal proceedings and requirements. We may use the information we collect to investigate or address claims or disputes relating to your use of Pack Leaders ATL's services, or as otherwise allowed by applicable law.

5. Communications from Pack Leaders ATL. Pack Leaders ATL may use the information we collect to communicate with you about products, services, promotions, studies, surveys, news, updates and events. Pack Leaders ATL may also use the information to promote and process contests and sweepstakes, fulfill any related awards, and serve you relevant ads and content about our services. We do not share, sell, or lease Personal Information about you to any third parties for their marketing use.

6. ARCO Rights. You have the right to request the access to, rectify, cancel and oppose the management of your Personal Information (the "ARCO Rights"). Furthermore, you have the right to request the revocation of your given consent, as well as limit the use of your Personal Information. In order to exercise your rights, we ask that you send an e-mail to info@packleadersatl.com, so we can send you the appropriate request form, which you should complete and submit through the same electronic means from which you received it.

For security purposes and in compliance with the law, it is mandatory that all request forms be accompanied by the information necessary for us to identify the applicant, and if applicable his or her legal representative.

As a result, your request form should be accompanied with the following documents: (i) request form fully completed and signed; (ii) copy of the holder's identification; (iii) in the case of legal representation, simple copy of the document that establishes his or her Power-of-Attorney,

as well as a simple copy of his or her identification; (iv) address, phone number, and e-mail; (v) whether or not the holder accepts to be notified via e-mail; (vi) clear and precise description of the information related to the exercise of your ARCO rights; (vii) if applicable, indicate which specific piece of information should be corrected and how it should be correctly read; (viii) if applicable, expressly state to revoke the consent to the management of your Personal Information; (ix) any other piece of information that will allow us to properly identify your Personal Information.

Please be advised we keep a record of all the submitted requests. Furthermore, in case the request form should be found incomplete, we have the right to request the missing information from you.

The applicant guarantees that the given Personal Information is exact, complete and authentic. As a result, the applicant is responsible for any damage and/or harm caused by falsified information or identity impersonation.

Your request shall be processed in accordance with the manner and time established by law. We commit ourselves to give a response no later than twenty (20) business days after we have received your request form. The waiting period could be extended by another twenty (20) business days if and when it is justified and the holder is notified. Upon request of access to your Personal Information, it shall be given digitally. Upon request of expressly requesting it, your Information will be sent in the form of copies to your indicated address.

7. Consent. You have the right to revoke your consent to the management of your Personal Information. The procedure, requirements, and contact information needed for you to revoke your consent shall be the same as the procedure needed to exercise your ARCO Rights established above.

8. Cookies and Third Party Technologies. Pack Leaders ATL and its partners use cookies and other identification technologies on our apps, websites, emails, and online ads for purposes described in this policy. Cookies are small text files that are stored on your browser or device by websites, apps, online media, and advertisements. Pack Leaders ATL uses cookies and similar technologies for purposes such as: authenticating users; remembering user preferences and settings; determining the popularity of content; delivering and measuring the effectiveness of advertising campaigns; analyzing site traffic and trends, and generally understanding the online behaviors and interests of people who interact with our services. We may also allow others to provide audience measurement and analytics services for us, to serve advertisements on our behalf across the Internet, and to track and report on the performance of those advertisements. These entities may use cookies, web beacons, SDKs, and other technologies to identify your device when you visit our site and use our services, as well as when you visit other online sites and services. A cookie notice will provide you with the option to reject the use of cookies. However, if you choose to reject cookies, some features and functions within the platform may be impacted. You can view, update or remove any Personal Information that you have provided to us for inclusion in your user profile by amending your user profile or emailing info@packleadersatl.com.

9. Information Sharing and Disclosure. We may share your information with our affiliates, subsidiaries and business partners, or for legal reasons or in the event of a dispute. Pack Leaders ATL may share the information we collect:

a. At your request - This includes sharing your information with Pack Leaders ATL business partners at your request. For example, if you requested a service offered by a third party, Pack Leaders ATL may share your information with those third parties. This may include, for example, other apps or websites that integrate with our APIs or services, or those with an API or service with which we integrate, or business partners or third parties with whom Pack Leaders ATL may collaborate with to deliver to provide you with a service.

b. With the general public when you submit content to a public forum - including through public forums such as blogs, social media, and certain features on our network. When you communicate with us through those channels, your communications may be viewable by the public.

c. With the owner of Pack Leaders ATL accounts that you may use - If you use a profile associated with another party we may share your service information with the owner of that profile. This occurs, for example, for users who receive services arranged by another person.

d. With Pack Leaders ATL subsidiaries and affiliates - We share information with our subsidiaries and affiliates to help us provide our services or conduct data processing on our behalf. For example, Pack Leaders ATL may process or store information on behalf of its subsidiaries and affiliates.

e. With Pack Leaders ATL service providers and business partners - Pack Leaders ATL may provide information to its vendors, consultants, marketing partners, research firms, and other service providers or business partners. For example, Pack Leaders ATL may provide information to such parties to help facilitate service, to conduct surveys on our behalf, and to process payments for our services.

f. For legal reasons or in the event of a dispute - Pack Leaders ATL may share your information if we believe it is required by applicable law, regulation, operating agreement, legal process or governmental request. This includes sharing your information with law enforcement officials, government authorities, or other third parties as necessary to enforce our Terms of Service, user agreements, or other policies, to protect Pack Leaders ATL's rights or property or the rights or property of others, or in the event of a claim or dispute relating to your use of our services. This includes sharing your information with others in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company.

g. With your consent - Pack Leaders ATL may share your information other than as described in this policy if we notify you and you consent to the sharing.

10. Security of Collected Information. We maintain reasonable physical, administrative, and technical security measures to protect the confidentiality, availability, and integrity of Personal Information. It is important to note that no method of safeguarding information is completely secure. While we try to ensure the protection of your Personal Information, we cannot guarantee (or be accountable/liable) that our safeguards will be effective or sufficient.

11. Your Rights Regarding Your Personal Information. Users of the Services, including you, have a variety of legal rights regarding the processing of Personal Information. These rights vary depending on applicable law, but may include by way of example:

- The right to know what Personal Information we maintain about you;
- The right to know with whom we have shared your Personal Information;
- The right to receive a copy of your Personal Information; and
- The right to access, correct, or delete your Personal Information.

You may exercise any rights you have under your applicable law with respect to Personal Information by contacting us as described herein. We may request additional information from you to authenticate any such requests. In addition, you may be able to view, access, correct, or delete some or all of the Personal Information through our update procedures.

12. Information Retention And Deletion - Pack Leaders ATL retains your information while your account remains active, unless you request deletion of your information or account. Subject to the exceptions described below, Pack Leaders ATL deletes or anonymizes your

information upon request. Pack Leaders ATL may retain information after account deletion, as required by law, if there is an unresolved issue relating to your account, such as an unresolved claim or dispute; if we are required to by applicable law; and/or in aggregated and/or anonymized form. Pack Leaders ATL may also retain certain information if necessary for its legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, if Pack Leaders ATL shuts down a user's account because of unsafe behavior or security incidents, Pack Leaders ATL may retain certain information about that account to prevent that user from opening a new Pack Leaders ATL account in the future.

13. Children. The Services are not intended for children under the age of sixteen (16), and children under the age of sixteen (16) are not permitted to use the Services without written consent from a parent or legal guardian. We may collect information from children under the age of 16 to the extent provided by a parent or guardian, and such information would be associated with the parent or guardian, not the child.

14. Email, Opt-Out and Marketing Communications. If you no longer wish to receive email communications from us, you can follow the specific unsubscribe instructions in the email you receive or contact us at the address below. If you do business with us, you may not opt out of certain automated notifications (including confirmation, welcome, and post-departure emails) based on the particular transaction.

15. International Use. Your Personal Information may be stored, used, and processed in any country where we have facilities or where we have engaged a Provider, and by your use of the Services you acknowledge that we may transfer information to countries outside of your country of residence, which may have different data protection rules than in your country. All Personal Information held by Pack Leaders ATL directly is stored at the applicable site and/or in the United States, which may require transfer of the Personal Information from your location to the property's location and/or the United States.

16. Privacy Statement for Information Subjects Whose Personal Information May Be Collected in the European Union. Pack Leaders ATL may have from time to time users who are from the European Economic Area ("EEA"). In order to serve these users, we may transfer Personal Information from individuals ("Data Subjects") located within the EEA. Personal information that may be collected by us from a Data Subject in the EEA may include: name, email, phone number, login name and password, birth date, home address, home access information, payment information, pet information, veterinarian information, other pet information and photos. The information that we collect may be transferred outside of the EEA, including to countries, such as the United States. We will ensure, that the transfer of this information shall be made in a legitimate and secure manner outside the EEA as necessary. Data Subjects whose Personal Information is collected in the EEA may withdraw consent at any time where consent is the lawful basis for processing his/her information. Should a Data Subject withdraw consent for processing or otherwise object to processing that impedes Pack Leaders ATL's ability to comply with applicable regulations, a Data Subject may be unable to avail him/herself of the services that Pack Leaders ATL provides. All individuals whose Personal Information is held by Pack Leaders ATL have the right to: (i) ask what information Pack Leaders ATL holds about them and why; (ii) ask for a copy of such information or access to such information; (iii) be informed how to correct or keep that information up to date; and (iv) be informed on how Pack Leaders ATL is meeting its data protection obligations. Furthermore, for data collected in the EEA, Data Subjects have the right to: (i) ask for a copy of such information to be sent to a third party; (ii) ask for data to be erased if possible and required under the GDPR; (iii) ask for processing of Personal Information to be restricted if possible and required under GDPR; (iv) object to the processing of Personal Information if possible and required under GDPR; (v) object to automated decision-making where applicable; and (vi) contact a supervisory authority in the EEA to lodge a complaint regarding Pack Leaders ATL processing of your Personal Information. Pack Leaders ATL does not share any Personal Information with any nonaffiliated third parties, except in the following circumstances: (i) as necessary to provide the service that the customer has requested or authorized, or to maintain

and service the customer's account; (ii) as required by regulatory authorities or law enforcement officials who have jurisdiction over Pack Leaders ATL and its affiliates or as otherwise required by any applicable law; and (iii) to the extent reasonably necessary to prevent fraud and unauthorized transactions. Pack Leaders ATL personnel is prohibited, either during or after termination of the employment, from disclosing Personal Information to any person or entity outside Pack Leaders ATL, including family members, except under the circumstances described above. An employee is permitted to disclose Personal Information only to such other employees who need to have access to such information to deliver our services to the customer. If you are located in the European Economic Area ("EEA") or Switzerland and have questions or concerns regarding the processing of your Personal Information, you may contact us at: info@packleadersatl.com. If, as an EEA Citizen, you believe that Pack Leaders ATL has not adequately resolved any such issues, you have the right contact the EU supervisory authority.

17. Contacting Us. If you have any questions about this Privacy Policy, our privacy practices, or the processing of Personal Information, please contact us. We welcome your questions and suggestions about our Privacy Policy and will use reasonable efforts to respond in a timely manner. Please feel free to email us at info@packleadersatl.com.

II. Choice And Transparency

Pack Leaders ATL provides means for you to control the information that Pack Leaders ATL collects, including marketing opt-outs.

1. Marketing Opt-Outs. You may opt out of receiving promotional emails and other messages from Pack Leaders ATL by following the instructions in those messages. Please note that if you opt out, we may still send you non-promotional messages.

2. Accessing and Correcting Your Information. You can edit the name, phone number and email address associated with your account by contacting Pack Leaders ATL at info@packleadersatl.com. You may also request access to, correction of, or a copy of your information by contacting Pack Leaders ATL.

III. Updates To This Policy

We may from time to time update our Privacy Policy to reflect changes to our services and policies. When we update the Privacy Policy, we will revise the "Effective" date listed at the top of this page. We encourage you to periodically review this Privacy Policy to keep apprised of how we use Personal Information.