



TRAIN 360 APPLICATION PRIVACY POLICY FOR 360 IMMERSIVE, LLC

360 Immersive, LLC dba DTX Creative a Limited Liability Company with its primary location at 967 E Parkcenter Blvd, #253 Boise, Idaho 83706, United States, referred to as the “Company” handles, as follows, personal and other information, referred to as the “ Personal Data” of the individual(s) that have consented to the terms and conditions for and registered with the Train 360 application, referred to as the “Services”.

This Privacy Policy covers how Personal Data about the individual using the Train 360 application, referred to as the “User(s)”, that the Company receives, or collects is treated.

PRIVACY POLICY SUMMARY Among the types of Personal Data that the Train 360 application collects, by itself or through third party service providers, there are: Email address; User account credentials.

1. [Amazon Web Services](#) (AWS) For Hosting and backend infrastructure, AWS gathers Personal Data to include Email address, Cookies and/or various types of Usage data as specified in the privacy policy of the service

INFORMATION COLLECTED ABOUT THE USER Among the types of Personal Data that the Train 360 application collects, by itself or through third parties, there are: Email address; User account credentials. Personal Data may be freely provided by the User. Unless specified otherwise, all data requested by the Train 360 application is mandatory and failure to provide this data may make it impossible for the Train 360 application to function properly.

In cases where the Train 360 application specifically states that some Personal Data is not mandatory, Users are free not to communicate this data without consequences to the availability or the functioning of the Service. Users who are uncertain about which Personal Data is mandatory are welcome to contact the Company (see the Contact Us section below). Users are responsible for any third-party Personal Data obtained, published or shared through the Train 360 application, and confirm that they have the third party's consent to provide the Personal Data to the Company.

USE OF INFORMATION The Company may use usernames, name, and contact information to provide Users with updates related to the Services, in connection with the Company’s marketing and promotional efforts, and to contact Users regarding administrative notices. Additionally, the Company may use username, name, and contact information in connection with any beta testing Users participate in and to resolve disputes, troubleshoot problems and enforce additional User agreements as applicable.

MODE & PLACE OF PROCESSING The Company takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized distribution of Personal Data. The data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In some cases, the data may be accessible to certain types of persons in charge, involved with the operation of the Train 360 application (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies)



appointed by the Company. The updated list of these parties may be requested from the Company at any time.

The Company may process Personal Data relating to Users if one of the following applies: Users have given their consent for one or more specific purposes. Note: Under some legislations the Company may be allowed to process Personal Data until the User objects to such processing (“opt-out”), without having to rely on consent or any other of the following legal bases. This, however, does not apply, whenever the processing of Personal Data is subject to European data protection law; provision of Personal Data is necessary for the performance of an agreement with the User and/or for any pre-contractual obligations thereof; processing is necessary for compliance with a legal obligation to which the Company is subject; processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company; processing is necessary for the purposes of the legitimate interests pursued by the Company, or by a third party. In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Personal Data is processed in the United States, and any other places where the parties involved in the processing are located. Depending on the User's location, data transfers may involve transferring the User's data to a country other than their own. To find out more about the place of processing of such transferred data, Users can check the relevant sections of this document or inquire with the Company (see the Contact Us section below).

Users are also entitled to learn about the legal basis of data transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by the Company to safeguard their Personal Data. If any such transfer takes place, Users can find out more by checking the relevant sections of this document or inquire with the Company (see the Contact Us section below).

RETENTION OF THE DATA Personal Data collected for purposes related to the performance of a contract between the Company and the User shall be retained until such contract has been fully performed. Personal Data collected for the purposes of the Company's legitimate interests shall be retained as long as needed to fulfill such purposes. Users may find specific information regarding the legitimate interests pursued by the Company within the relevant sections of this document or by contacting the Company (see the Contact Us section below).

The Company may be allowed to retain Personal Data for a longer period whenever the User has given consent to such processing, as long as such consent is not withdrawn. Furthermore, the Company may be obliged to retain Personal Data for a longer period whenever required to do so for the performance of a legal obligation or upon order of an authority. Once the retention period expires, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

THE RIGHTS OF USERS The Company believes that the User should have the ability to access and edit the Personal Data collected. Users are encouraged to promptly update Personal Data if it changes. User may also ask to have Personal Data deleted or removed. These and other rights which may apply are set



out in more detail below, and in certain circumstances are subject to certain exceptions. Users may have the right to request the Company to:

1. Disclose personal information collected, used, or disclosed, and information about Personal Data practices;
2. Delete Personal Data that has been collected about; not be discriminated against for exercising the right to know or right to request deletion;
3. Rectify any Personal Data which is inaccurate;
4. Stop processing Personal Data; and object to processing Personal Data, or withdraw User consent.

To submit a request, please contact the Company (see the Contact Us section below). To fulfill your request, the Company will need to verify User identity. Only the User, or someone legally authorized to act on the User's behalf, may make a request related to Personal Data collected about the User. To designate an authorized agent, the authorized agent must provide sufficient information that allows the Company to reasonably verify that they have been authorized by the User to act on their behalf. If the User has any complaints regarding the Company privacy practices, the User agrees to contact the Company (see the Contact Us section below). The User also has the right to submit a complaint with User's national data protection authority.

ADDITIONAL INFORMATION ABOUT DATA COLLECTION AND PROCESSING The Company does not sell User information. Occasionally the Company may be required by law enforcement or judicial authorities to provide Personal Data to the appropriate governmental authorities. Upon receipt of a search warrant, court order, subpoena, or other legal request, the Company may access, preserve and share information with regulators, law enforcement, or others if there is a good faith belief that the law requires the Company to do so. This includes responding to legal requests from jurisdictions outside of the United States where there is a good faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.

The User should also be aware that when Personal Data is voluntarily disclosed in the Services (e.g., through chat functions) or on our social media pages, that information can be collected and used by third parties and may result in unsolicited messages (including unwanted spam messages) from third parties. Such activities are beyond the Company's control and this Privacy Policy does not apply to such information.

USERS FROM CALIFORNIA Since 2005, California Civil Code Section 1798.83 permits Users who are California residents to request certain information regarding the disclosure of Personal Data to third parties for their direct marketing purposes. The Company does not share User Personal Data with unaffiliated third parties for their own direct marketing purposes. Since January 1, 2015, California Business and Professions Code Section 22581 permits California resident users under the age of 18, to view, correct, or remove information provided or publicly posted by User. Users may send the Company an email requesting to remove such content (see the Contact Us section below). The Company will review, update, remove or anonymize information and/or content as appropriate. Residual copies of information and/or content that have been removed from the User account and/or the Train 360 application may remain in backup systems for approximately one month.

The Company may still retain User information to resolve disputes, enforce our user agreement, or comply with legal requirements; in this case, User Personal Data will be blocked from use for any other



purpose. California Business and Professions Code Section 22575(b) (as amended effective January 1, 2014) permits Users who are California residents to be informed as to how the Company responds to web browser "Do Not Track" settings. The Train 360 application does not support "Do Not Track" requests. To determine whether any of the third-party services it uses honor the "Do Not Track" requests, please read their privacy policies.

CHANGES TO THIS PRIVACY POLICY The Company reserves the right to make changes to this Privacy Policy at any time by notifying the User on this page and possibly within the Train 360 application - as far as technically and legally feasible - sending a notice to the User via any contact information available to the Company. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. Should the changes affect processing activities performed based on the User consent, the Company shall collect new consent from the User, where required.

CONTACT US If Users have any questions, comments, requests or concerns about this Privacy Policy or other privacy-related matters, may contact the Company in the following ways:

Mail: 360 Immersive, LLC
Attn: Business and Legal Affairs
967 E Parkcenter Blvd #253
Boise, ID 83706
Phone: (888) 843-9580
Email: info@360immersive.com

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