BI SmartLINK® Privacy Policy

Last modified: March 18, 2022

Introduction

BI Incorporated ("Company" or "We"), the owner of BI SmartLINK®, respects your privacy and is committed to protecting it through compliance with this policy. This policy describes:

- The types of information we collect and that you may provide when you download, register, access, or use BI SmartLINK® (the "App") in connection with your community supervision by a local, state or federal government agency, or a contractor of one of the foregoing (your “Community Supervision Agency”).

- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in or through the App. This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.

- You provide to or is collected by any third party.

Our websites and apps have their own privacy policies, which we encourage you to read before providing information on or through them. We are not responsible for third party websites. You may access, use, and exchange information through third party websites only at your own risk.
continued use of this App after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

Information We Collect and Use

We collect through the App and use various categories and types of information in connection with community supervision and other uses described below. Such categories of information include:

- Location information, but only when you use the App;
- Personal information such as your name, email address, user ID, address, phone, and other personal identifiers which may include government identifier, date of birth, gender identity, etc.
- Messages (and messaging), but only for communications for which the App is used;
- Photos and videos taken or submitted through the App;
- Audio files sent through the App, including voice samples and audio messages;
- Files created and stored by you, or accessible through the App such as resources that may be available in connection with your community supervision;
- App activity, which may include App interactions and usage information such as your responses to notifications, in-App search history, web browsing, phone calls, video conferencing, and other actions conducted and information entered within the App;
- App performance information; and
- Device information such as device identifiers, IP address, internet connections, operating system, browser type, mobile network information, battery information, and the device’s telephone number.

How We Collect Information

We collect information from and about users of our App:
By which you may be personally identified, including, but not limited to, name, postal address, email address, government identification, photo, voice sample, or telephone number ("personal information").

That is about you but individually does not identify you, including, but not limited to, employment, gender, or date of birth.

You may also provide information to us when using certain features of the App, such as messaging. We may also ask you for information when you report a problem with the App.

Automatic Information Collection
When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details about App Activity.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including communication data and the resources that you access and use on or through the App.

- **Device Information.** We may collect information about your mobile device and internet connections, including the device’s unique device identifier, IP address, operating system, browser type, mobile network information, battery information, and the device’s telephone number.

If you do not want us to collect this information, contact your Community Supervision Agency before you download, register with, or use this App. For more information, see the BI SmartLINK Terms of Use and End User License Agreement.

Third-Party Information Collection
BI Incorporated has not consented to the collection of your personal information by any third parties. Nevertheless, when you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:
The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We are not responsible for the actions of any such third parties.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.
- Fulfill any other purpose for which you provide it.
- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us and/or between your Community Supervision Agency and us, including for billing and collection.
- Notify you when App updates or changes to this policy are available, and of changes to any products or services we offer or provide through the App.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Recognize you when you use the App.
In addition, we may disclose personal information that we collect or you provide:

- To third parties as required in connection with your community supervision, for example, your location information, photo, voice message, or other personal information may be submitted to your Community Supervision Agency.
- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of BI Incorporated’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by BI Incorporated about our App users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us and/or our agreements with your Community Supervision Agency, including the BI SmartLINK Terms of Use and End User License Agreement, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of BI Incorporated, our customers or others.
We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us through the App is transmitted securely and stored with encryption on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

Retention of Information

We destroy the information we collect when the purpose for which it was provided has been fulfilled unless we are required to keep it longer by law or official policy. In some cases information that we receive or collect as a contractor or service provider for a Community Supervision Agency may become an agency record and may be subject to a Freedom of Information Act or similar request directed to that Community Supervision Agency.

Children Under the Age of 13

The App is not intended for children under 13 years of age, and we do not knowingly collect personal information from children under 13. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact your Community Supervision Agency.
Over the previous twelve months, we have collected or received, from users of the App, personal information described by category below for business purposes.

- Identifiers such as your name and contact information, account name(s), social security number, A-number and other similar identifiers, are used to verify your identity, to communicate with you, and to provide services to you related to your community supervision, including billing and collection.

- Personal information as described in Cal. Civ. Code § 1798.80(e), which in addition to Identifiers also includes other identifying information not publicly available such as education, employment and employment history, financial information, and medical information. We use this type of personal information to verify identities, to communicate with you, to provide services to you in connection with your community supervision, and for billing and collection purposes.

- Characteristics of protected classifications such as age, sex, religious affiliation, etc., are used to verify your identity, provide services to you in connection with your community supervision, and for reporting and compliance with laws and regulations.

- Biometric information such as facial images from photos and voice samples from audio files are used to verify your identity and to provide services to you in connection with your community supervision.

- Geolocation data about physical movements and location is used to provide services to you in connection with your community supervision.

- Commercial information about prior and prospective transactions is used to provide services to you and your Community Supervision Agency.

- App activity and other usage activity such as Internet and similar network activity, device information, and other interactions with the App are used by us: to verify identities; to maintain and improve the App, its functionality, and our products and services; to detect, prevent, or investigate security incidents or fraud; and to maintain records for administrative and security purposes.

- Audio, electronic, visual, and similar information is used to verify identities and to provide services in
• Education information is used to verify identities and to provide services in connection with community supervision.

We collect or receive such personal information from the following sources:
• Directly from you when you provide it to us;
• Automatically when you use the App.

Rights under California Law

Access to Your Personal Information
You may request access to the personal information that we have collected and maintained about you (along with information concerning its use and disclosure) over the past twelve months after receipt of appropriate verification. You may only make two such requests during any twelve-month period.

Deletion of Personal Information
You have the right to request that we delete personal information collected and maintained about you, subject to certain exceptions. Once your request is verified and we have determined that we are required by law to do so, we will delete your personal information accordingly. Any request to delete personal information may be denied if it is necessary for us to retain your information under one or more exceptions recognized by California law. Please note that a record of your deletion request may be retained.

Opting Out
You have the right at any time to direct us not to sell your personal information, which is your right to opt-out. We have not sold personal information within the previous twelve months.

Non-Discrimination
We will not discriminate against you for exercising any of your rights under California law.

Exercising Your Rights
Verifying Your Request
Only you, or a person that you authorize to act on your behalf, may make a request concerning your personal information. For requests to access or delete personal information, your request must be verified before we can fulfill it. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are either the person about whom we collected personal information, or a person authorized to act on your behalf. Such verification information may include non-public Identifier information and other personal information that you have previously provided to us. We use the personal information that you have provided in a verifiable request in order to verify your request. If we cannot verify your identity or authority, we may deny your request. Please also note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

Your Right under the California “Shine the Light” Law
Residents of California also have the right to obtain certain information about the types of personal information that companies with whom they have an established business relationship (and that are not otherwise exempt) have shared with third parties for direct marketing purposes during the preceding calendar year. If you wish to submit a request, please contact us at privacy@geogroup.com. We have not shared personal information with third parties for direct marketing purposes within the preceding calendar year.

Do Not Track
The App currently does not respond to browser Do Not Track signals or similar signals.

Contacting Us
If you have any questions regarding our privacy practices related to the personal information of California
Changes to Our Privacy Policy

We may update our privacy policy from time to time. If we make material changes to how we treat our users’ personal information, we will post the new privacy policy on this page with a notice on the App that the privacy policy has been updated.

The date the privacy policy was last revised is identified at the top of the page. You are responsible for periodically visiting this privacy policy to check for any changes.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact your Community Supervision Agency, or contact us in writing at:

Chief Privacy Officer
BI Incorporated
6265 Gunbarrel Avenue, Suite B
Boulder, Colorado 80301

Or call us toll-free at (800) 241-2911.