

PRIVACY POLICY

Effective as of: August 8, 2017

This Privacy Policy (the "Privacy Policy") applies when you access, visit or use the websites owned by Navico Holding AS and operated through its U.S. subsidiary Navico, Inc. (the "Company," "we", "us" or "our") located at gofreemarine.com and gofreeshop.com (collectively, the "Site" or "GoFreeShop") or use any of the GoFree products and services including but not limited to any products and services that we offer through the GoFree Shop, including without limitation our proprietary Insight Genesis technology, Track, GoFree Telematics, GoFree Hooked, GoFree Link, BioBase and Insight Planner (the Site and these products and services will be referred to in this Privacy Policy as the "Service"). We want to develop relationships with our customers based on respect and integrity. We are aware of the trust and confidence you demonstrate when you access, visit or use the Service and provide us with information. This Privacy Policy is posted to demonstrate our commitment to protecting your privacy online. This Privacy Policy is part of, and is governed by, the terms and conditions set forth in the Navico Terms of Use located at <http://www.gofreemarine.com/support/Policies>. Transactions and purchases made by you through the Site may be processed by our service provider C-Map USA, Inc. located at Centro Direzionale Olidor Via Dorsale 9 - Scala B 54100 Massa ITALY. Please review Section 4(A) below in order to learn more about how we share your information with service providers like CMAP.

By clicking the "accept" button when you register to use the Service, and by subsequently accessing, visiting and using the Service, you agree to accept the practices described in this Privacy Policy and consent to the collection, use and disclosure of personal information described in this Privacy Policy, including the use of cookies to collect information about you. If you do not agree to the terms of this Privacy Policy, please do not use the Service. We reserve the right to modify this Privacy Policy at any time, so each time you use the Service, you should check the date of this Privacy Policy (which appears above) and review any changes that have been made since your last visit to or use of the Service. Where appropriate or as required by applicable law, we shall notify you of any changes to this Privacy Policy.

1. **Information Collection.** The information described in this Section 1 is collected by Company through the Service. By using the Service, you expressly agree to the collection and use of the information described below.

A. Information We Directly Collect From You: We collect the following types of personal information (collectively, "**Personal Information**") that you voluntarily provide to Company through your use of the Service:

- o Personal Identifiers. A "Personal Identifier" is information that can be used to identify and/or contact a natural person and includes, but is not limited to, name, postal address, telephone number, or email address.
- o Other Personal Information. "Other Personal Information" is information combined with Personal Identifiers that may include your country of residence, demographic information (for example, gender or age), purchases made through the Site, credit card information or purchase history, correspondence sent to us through the Service or information regarding your tastes and preferences. In addition, if you register with the Service, you will be required to create a unique user ID and password which will be associated with your Personal Identifiers.

B. How We Directly Collect Personal Information: There are a number of different ways that we collect Personal Information from you. These may include:

- Communications From You. When you email or write to us, you may provide us with your name, contact details, and other Personal Information as part of your message.
- Customer Support. You may provide us with Personal Information when you telephone or email us to request technical assistance with our products or information that you would like to receive about our products.
- Email/Direct Mail Campaigns That You Approve. If you elect to receive our online newsletters or other promotional email communications, from time to time we may contact you with information about new products, promotions or special offers. If you want to stop receiving promotional communications from us, you can follow the unsubscribe instructions at the bottom of each email, contact us at GoFreeSupport.amer@navico.com or, if you have an account with us, change your preferences by signing into your account through the Service.
- Registration of Products. If you register a Navico product, you may be asked to provide information that we will use to record you as an owner of a Navico product and to assist us in providing you with product specific accessories, services and information.
- Purchases. If you wish to purchase Navico products through the Service we will require sufficient information to complete your purchase including your credit card information.
- Surveys. From time to time we may conduct surveys in respect of our products and services. Participation in our surveys is optional. However, if you respond to one of our surveys, we may ask you for information such as what type of boat you own, what your experience is with marine electronics, whether you prefer saltwater or freshwater boating and about other preferences that you might have. We will use this information to operate and improve the Service and to determine the types of offers, products or services that may be of interest to you.

If you do not provide us with the information we request from you, we may not be able to provide you with the products or services we offer through the Service.

C. Information That We Automatically Collect From Your Computer: We (or service providers on our behalf) may automatically collect information from you using “session cookies.” Session cookies are small amounts of data that are temporarily stored within your computer’s Internet browser while accessing our Site.

Information collected by session cookies may include, without limitation:

- the pages you visit within the Service;
- the date and time of your visit to the Service;
- the Internet Protocol (IP) address used to connect your computer to the Internet;

- your computer and connection information such as your browser type and version, browser language, operating system and platform; and/or
- your purchase history.

We will use data gathered using session cookies to help us improve your experience of the Service. You can set your browser to reject cookies or to notify you when you are sent a cookie. You can also purchase and download software that will allow you to visit the Service without providing the information gathered by cookies. You are welcome to use the Service if you use such software, but your experience while visiting or using the Service may not be optimal.

BY USING THE SERVICE WITHOUT SETTING YOUR BROWSER TO REJECT COOKIES, YOU AGREE TO THE USE OF COOKIES BY US, WITHOUT LIMITATION, AS SET FORTH IN THIS PRIVACY POLICY.

2. **Other Information That You May Choose To Provide:** The following is information you may choose to provide to Company in connection with your use of the Service. The information listed in this Section 2 will be collected by Company, unless you affirmatively Opt-out (the procedure to Opt-out is described below in Section 8).

- Sonar Logs
- Vessel data, including vessel location, vessel tracking history, vessel alarm notices, engine running data and engine alert data
- Digital photographs that you upload, post, create, use or access through the Service
- Product reviews you post on the Service – Any review that you post may be viewed by other users of the Service. If you elect to post a review we recommend that you do not post any Personal Information or other information that you do not want to make publicly available. **You are solely responsible for any loss of privacy or other harm resulting from the content you post as part of a product review.**

3. **Collection of Information by Third Parties.** If you visit or access the Service through a third-party website, the third-party website may give you a unique code, cookie or graphic which will uniquely identify you. This will only happen if you link directly from a third party website to the Service. Your activities on the Service while such a code is active may be reported back to the third party website. We will not report any information to these third party websites that will allow them to personally identify you. The presence of a third party navigation bar at the top of any webpage of the Service is an indication that the third party website may be able to see your activity on the Service.

We may also provide social media features through the Service that enable you to share information with your social networks and to interact with us on various social media platforms. Your use of these features may result in the collection or sharing of information about you, depending on the feature. We encourage you to review the privacy policies and settings on the social media sites with which you interact to make sure you understand the information that may be collected, used, and shared by those platforms. Navico does not adopt, approve, endorse, review or enforce any privacy policies or settings of the social media platforms that may be used.

4. **Use of Information Collected By Us.** We use the information described above (a) to process and fulfill any orders you place through the Service, including sending confirmation emails of your order status and, if applicable, shipping products to you, and (b) to send information that you have requested about our products and services, and, if you have elected to receive promotional

communications, promotions, by email, postal mail, telephone, text message or other means. We may also use this information for our own statistical or analytical purposes, including to help us develop and improve our Service and/or products, and to tailor our Service to your interests. Further, we may incorporate the sonar, vessel and engine logs you elect to provide to us into our products and services and may sell these sonar, vessel and engine logs to third parties for use in their products and services. Any use of these logs in connection with our products or services, or the products or services of third parties will be on an anonymous basis and your Personal Information will not be associated with the applicable sonar logs.

5. **Sharing of Personal Information with Third Parties.** Except as expressly provided in this Privacy Policy, we will not share, rent, sell or otherwise disclose your Personal Information to unrelated or unaffiliated third parties without your consent.

A. Service Providers: We may employ other companies or individuals and their affiliates, contractors, suppliers, agents and employees (“**Service Providers**”) to provide certain services to us or on our behalf, such as operating and supporting the Service, processing payments and fulfilling orders you place through the Service, analyzing data, or performing marketing or consulting services. These Service Providers will only have access to the information needed to perform these limited functions on our behalf and are required to provide your Personal Information with at least the same level of protection and security as we use on the Service. Such Service Providers are prohibited from using your Personal Information for any purpose other than the purpose for which the applicable Service Provider was engaged by us. Any Service Providers that we permit to use data received from us may only do so in accordance with this Privacy Policy. We may also share aggregated information with our Service Providers, such as the number of users who used a certain feature of the Service, however, this aggregated information will not identify you personally.

B. Payment Card Companies: If you place an order through the Service, the information you provide will be transmitted to your payment card company to verify and authorize your purchase.

C. Law Enforcement and Protection of Users: To the extent permitted by law, we will disclose Personal Information to government authorities or third parties pursuant to a legal request, subpoena or other legal process. We may also use or disclose your information as permitted by law to perform charge verifications, report or collect debts owed, fight fraud or protect our rights or property as well as those of our affiliates or customers. **You should be aware that, following disclosure to any third party, your Personal Information may be accessible by others to the extent permitted or required by applicable law.**

D. Our Affiliates: We may share some or all of your information with our parent company, subsidiaries and corporate affiliates, joint ventures, or other companies under common control with us. We will require these entities to comply with the terms of this Privacy Policy with regard to their use of your information.

6. **Additional Privacy Protections for Children Using the Internet.** The Service is intended for a general audience and is not directed to children under the age of 18 or persons who are below the age of majority in any country. We will never knowingly collect Personal Information from children under the age of 18 or persons who are below the age of majority without verifiable parental consent. If you are under the age of 18 or are below the age of majority in your country, please do not provide us with Personal Information of any kind whatsoever. If we become aware that a user is under the age of 18 or is a minor in his or her country and has submitted Personal Information without verifiable parental consent, we will remove his or her Personal Information from our files. We understand that children may not fully understand all of the provisions of this Privacy Policy or make informed decisions about the choices that are made available to adult users of the Service. **We encourage parents and guardians to spend time with their children online and to be familiar with the websites they visit.**
7. **Security.** We will take all steps reasonably necessary to ensure your Personal Information is treated securely and in accordance with this Privacy Policy. We use appropriate security measures to protect against the loss, unauthorized access or disclosure, misuse or alteration of your Personal Information. All pages within our checkout process and areas containing personal information are secured using recognized industry standard technology to ensure data exchanged between you and us is encrypted. No computer system is fully secure, however, and there are inherent risks associated with Internet transactions. Consequently, we shall not be liable for unauthorized disclosure of Personal Information

due to no fault of our own including, but not limited to, system errors, errors in transmission and unauthorized acts of our employees or third parties. To make sure your Internet browser is using the latest security features, you should download and use the most recent version.

- 8. Corrections/Information Removal/Opt-Out.** If your name, e-mail or postal address, telephone number or other Personal Information changes, you may update, correct or omit the relevant information by contacting us at GoFreeSupport.amer@navico.com.

In addition, if you no longer wish to receive promotional communications from us you may opt-out by emailing us at GoFreeSupport.amer@navico.com or sending us a letter at: Navico, Inc., Attn: Legal Department, 4500 S. 129th E. Ave., Ste. 200, Tulsa, OK, 74134-5885, USA, or by clicking on the unsubscribe link within any marketing e-mail you receive from us.

You may also request information about how, where and why we collect and use your Personal Information, including information about how we share your Personal Information with third parties, by contacting us at GoFreeSupport.amer@navico.com.

If you wish to access the Personal Information collected or stored by us, or to instruct us to stop collecting, using or disclosing information about you, you can email us at GoFreeSupport.amer@navico.com, or send us a letter at: Navico, Inc., Attn: Legal Department, 4500 S. 129th E. Ave., Ste. 200, Tulsa, OK, 74134-5885, USA. If you withdraw your consent for the use or disclosure of your Personal Information for the purposes set out in this Privacy Policy (other than promotional purpose) you may not be able to access the Service and we may not be able to provide you with some or all of our products, services and customer support.

You may file a complaint with us in connection with the collection, use or processing of your Personal Information under this Privacy Policy by contacting us at GoFreeSupport.amer@navico.com. We will take reasonable steps to remedy any issues resulting from our failure to comply with our obligations relating to your Personal Information.

- 9. Lost or Stolen Information** If your credit card, password, or other Personal Information is lost or stolen, you should promptly notify us either by sending us an email at GoFreeSupport.amer@navico.com or by sending us a letter at: Navico, Inc., Attn: Legal Department, 4500 S. 129th E. Ave., Ste. 200, Tulsa, OK, 74134-5885, USA. Prompt notification of lost or stolen information will enable us to cancel the lost or stolen information and update your account with your new, secured information.
- 10. Closing Your Account; Retention of Personal Information.** Upon your request, we will close your account. We reserve the right to close or deactivate inactive accounts or accounts that are used in violation of our Terms of Use or any applicable law. We will retain Personal Information from closed or inactive accounts to the extent and as long as it is necessary and relevant for our operations and to comply with law, prevent fraud, collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, enforce our Terms of Use, and take other actions otherwise permitted by law. In general, personal information from closed or inactive accounts will be deleted or anonymized two (2) years after the account is closed or deactivated unless we have grounds to believe that the Personal Information should be retained for one of the purposes identified above.
- 11. Contact Information.** If you have any questions or concerns about this Privacy Policy, please e-mail us at GoFreeSupport.amer@navico.com, or send a letter to: Navico, Inc., Attn: Legal Department, 4500 S. 129th E. Ave., Ste. 200, Tulsa, OK, 74134-5885, USA.
- 12. Business Transfer.** In the event that the Company is sold, has its assets acquired or transferred, whether voluntarily or involuntarily, or merges or becomes affiliated with any other division, individual or entity, any customer information owned or under the control of the Company may be one of the transferred assets. Except as prohibited by applicable law, we reserve the right, as part of such transaction, to transfer or assign the Personal Information and other information we have collected from users of the Service.
- 13. Use of Information Outside of Your Country of Residence.** When you use the Service, your personal information may be collected, transferred, stored, processed, or otherwise used outside of your country of residence, including, for residents of European countries, outside the European

Economic Area (“EEA”). You acknowledge that your Personal Information and other information may be subject to privacy and data protection laws that may not be the same as such laws and regulations in your country of residence. However, we will take reasonable steps to ensure that your Personal information is adequately protected. These steps may include implementing appropriate agreements or requiring that appropriate technical, operational or security measures are in place.

Navico Inc. complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. A copy of Navico Inc.'s Safe Harbor Policy can be found at <http://www.gofreemarine.com/support/Policies>. Navico Inc. has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Navico's certification, please visit <http://www.export.gov/safeharbor/>.