INREACH PRIVACY STATEMENT

Last Updated: Sep 1, 2016

Version 2016.2

Your privacy is important to InReach, Inc. (“inReach”). We developed this Privacy Statement so you know how we collect, use, disclose, transfer and store your information. Please read through this Privacy Statement to familiarize yourself with our privacy practices.

This Privacy Statement describes the treatment of information inReach collects when you visit our website, create an account, register your device with inReach, subscribe to an inReach satellite communication service plan or use your inReach device and satellite communication services.

NOTICE: Your Personal Information will be collected and/or stored on servers of inReach or its affiliates and service providers located in the United States. If you reside in a country outside the United States, please note that the data protection and privacy laws of the United States may not be as comprehensive as the laws in your country.

1. COLLECTION AND USE OF INFORMATION

A. Personal Information

“Personal Information” is information that identifies a particular individual. When you create an account on the inReach website, have an account on the inReach website created on your behalf, register your products, purchase or otherwise obtain a product or subscribe for satellite communication services on the inReach website, sign up for a newsletter, participate in promotional activities, or contact our product support personnel, we may collect a variety of Personal Information, which depending on the circumstances may include your name, mailing address, phone number, email address, gender, date of birth, and payment card information.

We may use Personal Information about you for the following purposes:

i. **To Provide You Satellite Communication and SOS Emergency Services.** The inReach products and satellite communication services are designed to be used as a means of communicating the need for emergency response to appropriate authorities. In order for inReach, its affiliates and its service providers to perform this service, it may be necessary for inReach to store text, SMS and email messages sent to and from users. When you use the satellite communication services and trigger a SOS Emergency signal, inReach will provide information such as the message content, time sent, and the identify and location of the message sender and recipient to GEOS and the GEOS International Emergency Response Coordination Center (the “IERCC”) provider, and may also provide this information to competent authorities and first responders, and to members of your family. GEOS and IERCC may also provide such information as required to emergency responders.

ii. **Communications.** We may communicate with you, such as to provide you with the products and services you request, to communicate with you about your account or transactions with us, to give you important information about your products or applications and subscription, and (consistent with applicable laws and the choices available to you as described in Paragraph 6 below) send you offers and promotions for our products and applications.
iii. **Customer Support.** When you interact with our customer support representatives via email, telephone or in person, we may collect Personal Information relevant to the situation, such as your name, mailing address, phone number, email address and contact preferences; information about your product, such as their serial and device ID numbers, date of purchase and (if applicable) event logs that are useful in diagnosing product or application performance related issues; and information relating to a support or service issue. We use this information to provide you with customer and product support.

iv. **Purchases and Subscriptions.** If you provide your payment card information on the inReach website, then inReach will use your payment card information and related payment and account information, as well as your name and mailing address if applicable, for the purpose of filling your purchases or subscriptions, including collecting payment of recurring fees, if applicable. We may provide your billing information to a credit bureau in order to determine your credit-worthiness, or to a collection agency should your account become past due.

v. **Promotions.** If you enter into a sweepstakes, contest or similar promotion, we may use the information you provide to administer those promotions. To the extent that the terms and conditions of any such promotion regarding the treatment of Personal Information about you conflict with this Privacy Statement, the terms and conditions of the promotion will control.

vi. **Company Use.** inReach and its affiliates may use your Personal Information (a) for internal statistical, marketing or operational purposes, including generating sales reports and measuring and understanding demographic, user interest, purchasing and other trends among our customers, (b) to notify you of certain changes to this Privacy Statement, and (c) for any other purposes for which we notify you specifically at the time of collection or as otherwise described in this Privacy Statement or as permitted or required by law, rule, regulation, subpoena or other legal process.

**B. Other Information**

“Other Information” is any information that does not identify, and cannot reasonably be used to identify, a particular person, such as: browser and device information, app usage data, information collected through cookies, pixel tags and other technologies, demographic information and other information provided by you, anonymous information and aggregated information. Please note we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal information under applicable law, then we may use it as described in “Personal information” section above. In some instances, we may combine Other Information with Personal Information. If we combine any Other Information with Personal Information, the combined information will be treated by us as Personal Information as long as it is combined. Examples of Other Information include:

i. **Use of Apps.** When you download and use our apps, we and our service providers may track and collect app usage data, such as the date and time the app on your device accesses our servers and what information and files have been downloaded to the app based on your device number.

ii. **Device Usage Data.** When you use your inReach product, we may collect device usage data, such as timestamps and location of device usage, and device usage logs. We use this data to provide product support, to assist customers with troubleshooting their devices and to provide support to GEOS.

iii. **Server Log Information.** We and our service providers may use server log information for purposes such as calculating site usage levels, helping diagnose problems with our servers and administering our websites. These server logs may include information such as your Internet Protocol (IP) address, browser type, browser language, the date and time of your request, the time(s) of your visit(s) and the web page(s) that you visited. Collecting IP addresses is standard practice on the Internet and is done automatically by many web sites. Please note that we treat IP
Addresses, server log files, and related information as Other Information, except where we are required under applicable laws to treat any such information as Personal Information.

iv. **Cookies and Other Technology.** We may use cookies, pixel tags, web beacons, clear GIF’s or other similar tools on our websites or in our email messages. These technologies help inReach keep track of your movements within our sites, measure the effectiveness of advertisements, and compile aggregate statistics about site usage and response rates. They also help you to more smoothly navigate our websites. In addition, inReach uses Google Analytics as a method of tracking site statistics and user demographics, interests and behavior on many of our sites. We may also engage one or more third party service providers to serve online advertisements on our behalf. They may use a pixel tag or other similar technology to collect anonymous information about your visits to sites, and they may use that information to target advertisements for goods and services. This information is collected anonymously, in a manner that does not personally identify you. For more information regarding this practice and to opt-out of such collection and use of this information by our third party service providers, please see [Networkadvertising.org](http://Networkadvertising.org).

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2. **DISCLOSURE OF INFORMATION**

A. **Affiliated Entities**

We may share Personal Information that you provide to inReach with our affiliates worldwide for the purposes described in this Privacy Statement. You may access a list of our affiliates in the latest Annual Report on Form 10-K of our parent company, Garmin Ltd., which can be found at [www.sec.gov](http://www.sec.gov). Our affiliates are required to protect Personal Information about you in a manner consistent with this Privacy Statement. InReach, Inc. in the United States is the party responsible for managing jointly used Personal Information. If you reside in a country outside the United States, please note that the data protection and privacy laws of the United States may not be as comprehensive as the laws in your country.

B. **Service Providers**

In addition to GEOS and IERCC (which are discussed above), we may use other third party service providers to assist in the operation of our business. For example, we may use third party service providers to help us fulfill purchases, process payment card payments and ship products to you. We may share Personal Information about you, including payment card information, with these third parties for the sole purpose of enabling them to perform the services.

C. **Other Disclosures**

We may disclose Personal Information about you to others if we have your consent to do so in such form of consent as may be required under applicable law. We may also disclose Personal Information about you to others as described elsewhere in this Privacy Statement or if we believe to be necessary or appropriate: (a) under applicable law or regulation, including laws or regulations outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public authorities and law enforcement officials, including officials outside your country of residence; (d) to assist or support theft investigations involving inReach products or property, (e) to enforce any of our terms and conditions or policies; (f) to protect our operations or those of any of our affiliates and subsidiaries; (g) to protect the rights, privacy, safety or property of inReach, its affiliates and subsidiaries, you, or others; or (h) to permit us to pursue available remedies or limit the damages that we may sustain.

D. **Assignment**

We may transfer information to an affiliate, a subsidiary, or a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock, including, without limitation, in connection with any bankruptcy or similar proceeding.
3. VOLUNTARILY SHARING YOUR LOCATION INFORMATION WITH OTHERS

You might have an opportunity to choose to use an inReach or third party application on your device that allows you to invite third parties to view your location. If you choose to use such an application, then you should use caution when determining to whom you want to make your location information available. If you choose to post an invitation to view your location information on third party social networks, then, depending on the privacy practices of those social networks, it is possible that persons in addition to those to whom you intended to invite to view your location information could have access to such information. Accordingly, you should use caution when making such an invitation via third party social networks and you should carefully review the privacy practices of such social networks.

4. LINKS, THIRD PARTY APPLICATIONS, AND THIRD PARTIES' PRIVACY PRACTICES

Our websites, applications and products may contain links to other sites that are not operated by inReach or its affiliates, and our websites or your product may contain applications that you can download from third parties. These linked sites, services, and applications are not under our control and we are not responsible for the privacy practices or the content of any linked sites, services and applications. If you provide any Personal Information through any third-party sites, services, or applications, your transaction will occur on the third party's site, service, and/or application and the information you provide will be collected by, and controlled by, the privacy statement of that third party. We recommend you review the privacy statement of any such third parties.

5. SECURITY

InReach takes reasonable security measures to help protect against loss, misuse, unauthorized access, and unauthorized disclosure or alteration of the Personal Information under its control.

6. YOUR CHOICES REGARDING MARKETING CORRESPONDENCE

We will not share your Personal Information with third parties (other than our affiliates) for the third parties' marketing purposes unless you opt-in if and when we give you the opportunity to do so. We and our affiliates may use your Personal Information to send you marketing-related correspondence (including emails) related to inReach or Garmin products or applications unless you opt-out of receiving them.

To opt out of receiving marketing-related correspondence from inReach and our affiliates, click "Unsubscribe" from any marketing email you receive from inReach or Garmin.

7. USE OF WEBSITES, PRODUCTS AND APPLICATIONS BY CHILDREN

Our products and applications are not directed to individuals under the age of 13, and we request that individuals under 13 not provide Personal Information to inReach through any inReach website or through our products and applications. If we learn that we have collected the Personal Information of a child under 13, we will take steps to delete the information as soon as possible.

8. UPDATES TO THIS PRIVACY STATEMENT

We may change this Privacy Statement from time to time as we add new products and applications, as we improve our current offerings, and as technologies and laws change. You can determine when this Privacy Statement was last revised by referring to the "LAST UPDATED" legend at the top of this page. Any changes will become effective upon our posting of the revised Privacy Statement on our website.
We will provide notice to you if these changes are material and, where required by applicable law, we will obtain your consent. This notice may be provided by email, by posting notice of the changes on our website or by other means prior to the change becoming effective, consistent with applicable laws.

9. RETENTION OF PERSONAL INFORMATION

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law.

10. REVIEWING/CORRECTING/UPDATING/DELETING INFORMATION; DATA INTEGRITY

InReach takes reasonable steps to ensure that the Personal Information we collect from you is accurate, complete, and current. You may request access and request that erroneous or inaccurate Personal Information be updated. You may also request that your Personal Information be deleted. InReach will respond promptly to your requests and in any event within 30 days, or in accordance to applicable law. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We may decline to process requests that jeopardize the privacy of others, are extremely impractical, or would cause us to take any action that is not permissible under applicable laws. Please note that we may need to retain certain information for recordkeeping purposes, and there may also be residual information that will remain in our databases and other records, which will not be removed.

Access, correction or deletion requests can be made by sending an email to: productsupport.privacy@garmin.com.