

PRIVACY POLICY

Privacy Statement

Your privacy is important to Neonode, Inc. (the “**Company**”, “**Neonode**”, “**we**”, “**us**” or “**our**”). To better protect your privacy, we provide this statement explaining our online information practices, and the choices you can make about the way your information is collected and used on this website (this “**Site**”) and/or in connection with your placing an order (“**Order**”) with Neonode of one or more units of the AirBar product (the “**AirBar**”).

This policy regarding our privacy practices (the “**Privacy Policy**”) describes how we treat the information we or our strategic partners collect when you visit and/or use the Site or place an Order. When doing so, you also consent to the collection, transfer, manipulation, storage, disclosure and other uses of your information as described in this Privacy Policy – please read it carefully.

Please note that this Privacy Policy to the Company’s U.S. customers and users of the U.S. version of the Site. If you reside outside of the United States, please [click here](#) for your privacy policy.

Capitalized terms used but not otherwise defined in this Privacy Policy have the meanings set forth in the accompanying Terms and Conditions.

This Privacy Policy contains information concerning the following topics, among others:

- What personally identifiable information (“**PII**”) is collected on the Site and/or through your placing of an Order, and how the same may be used
- Sharing of PII with third parties
- Use of tracking technology
- Supplementing of PII with information from other sources
- How you can change PII you have provided
- Security measures in place

Notice of all changes that materially affect ways in which PII may be used or shared will be posted in updates to the Company’s Privacy Policy, and continued use of the Site and/or your non-cancellation of your Order (see accompanying Terms and Conditions regarding our cancellation policies) shall be deemed your consent to any such changes.

Information Collection and Use

When you create or place an Order or otherwise use the Site (for example, in order to post on our message boards or forums), we will ask you for certain PII, such as your username, password, name, shipping address, email address and/or telephone number. Under certain circumstances, we may use your PII, alone or together with other information that we or others may gather. For example, we may purchase demographic data from other companies.

We may use your PII, for example, to:

- Communicate with you regarding your Order
- Inform you via email about other products, programs or services offered by Neonode, or our affiliates or strategic partners (however, if you do not wish to receive such additional informative emails, please email us at hello@air.bar to opt out of the same)
- Conduct audits, data analysis and research
- Analyze, customize and improve our products and services, as well as the content of and advertisements on the Site
- Provide customer support
- Enter you in drawings, competitions and special promotions that the Company may host from time to time in its sole discretion
- Display advertising
- Enforce our Terms and Conditions

We sometimes collect data that, in and of itself, does not directly identify you. We may collect, use, disclose and transfer this non-personally identifiable information for any purpose. For example, we or our strategic partners may collect information about your visits to the Site, the links and advertisements that you click on and the URL that referred you to the Site. We and/or such third parties with whom we contract may use this information to serve you or like-minded consumers with advertisements relating to other products, programs or services.

We may share your PII with the Company's affiliates or strategic partners to fulfill your Orders. Additionally, if you place an Order, your credit card information will be submitted through a plug-in application from a third-party gateway provider, which third-party will store such data for processing payment for your Order, and may store such data for use in future Orders. Neonode shall not have access to your full credit card information.

We may share hashed portions of your PII with certain strategic partners to make our business more responsive to your interests and/or those of like-minded consumers. For example, we may aggregate your email address together with the email addresses of others who place Orders on our Site, locally hash such data, and transmit the resulting hashed data to Facebook for the purpose of creating "Custom Audiences" (where targeted ads are sent to people on Facebook who have already been on our Site), and "Lookalike Audiences" (where targeted ads are sent to people on Facebook who have similar characteristics to people on our Custom Audience list). If you wish to opt-out of this use of certain hashed portions of your PII, please email us at hello@air.bar, and we will begin the process of removing your data from our Custom Audience list.

We may disclose PII in response to legal process (for example, in response to a court order or a subpoena). We also may disclose such information in response to a law enforcement agency's request, or where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the

physical safety of any person, violations of our terms of use, to verify or enforce compliance with the policies governing our Site and applicable laws or as otherwise required or permitted by law or consistent with legal requirements. In addition, we may transfer PII about you if we, or one of our business units, are acquired by, sold to, or merged with another company.

You can change your PII by emailing us at hello@air.bar.

Device Information

When you use a mobile device like a smartphone to access our Site, we may access, collect, monitor or store information on your device. Device information could be small data files or similar data structures stored on or associated with your mobile device, which uniquely identifies your mobile device. Device information may be data stored in connection with the device hardware, data stored in connection with the device's operating system or other software, or data sent to the device by the Company.

Device information may be delivered to us or to a one or more of our strategic partners about how you browse and use the Site, and it may help us or others provide reports or personalized content and ads. Some features of the Site may not function properly if use or availability of device information is impaired or disabled.

Security of Information

We have put in place appropriate, industry-standard physical, electronic and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use the information we collect online.

Location Information

In some cases we collect and store information about where you are located, such as by converting your IP Address into a geolocation or utilizing the location services of our strategic partners. We may also ask you to provide information about your location, for example to use your geolocation information from your mobile device to geotag a post. We may use location information to improve and personalize services for you.

Cookies and Log Files

We may use cookies and web log files to track usage of the Site to facilitate access to the Site and to personalize your online experience. A cookie is a tiny data file which resides on your computer which allows the Company to recognize you as a user when you return to the Site using the same computer and web browser. Through the use of a cookie, we also may automatically collect information about your online and/or mobile activity and/or behavior, such as the web pages you visit, the links you click, and the searches you conduct. Most browsers automatically accept cookies, but you can usually modify your browser setting to decline

cookies. If you choose to decline cookies, please note that you may not be able to sign in or use some of the interactive features offered. As with information you enter at registration, cookie and log file data is used to customize your experience.

One type of cookie, known as a “persistent” cookie, is set once you’ve logged into the Site. The next time you visit the Site, the persistent cookie will allow the Company to identify you as an existing user so you will not need to log in before using the service. Another type of cookie, called a “session” cookie, is used to identify a particular visit to the Site. Session cookies expire after a short time or when you close your web browser.

Due to the communications standards on the internet, when you visit the Site we automatically receive the URL of the site from which you came and the site to which you are going when you leave the Site. We also receive the internet protocol (IP) address of your computer (or the proxy server you use to access the World Wide Web), your computer operating system and type of web browser you are using, as well as the name of your internet service provider (ISP). This information is used to analyze overall trends to help us improve the Site and the products and services we offer to you and like-minded consumers. The linkage between your IP address and your personally identifiable is never shared with third-parties without your permission or except when required by law.

Web Beacons

We allow other companies, called “ad” (i.e., advertising) networks, to serve advertisements to the Site’s users. Ad networks include third party ad servers, ad agencies, ad technology vendors and research firms. The Company may “target” some ads to users that fit a certain general profile.

To deliver these ads properly, the Company may include a file (known as a web beacon) from these ad networks within pages served by the Company so the ad networks may provide anonymized, aggregated auditing, research and reporting for advertisers as well as to target ads to you while you visit other websites.

Analytics information

We use third-party analytics tools to help us measure traffic and usage trends and online behavior. These tools collect information sent by your computer or mobile device or our Site, including the web pages you visit, add-ons, and other information that assists us in improving the Site. We collect and use this analytics information with analytics information from other users so that it cannot reasonably be used to identify any particular individual user.

Do Not Track

Some internet browsers have incorporated “Do Not Track” (DNT) technologies that can send a signal to the websites that you visit indicating you do not wish to be tracked. We do not currently respond to browser DNT signals.

Surveys

From time to time, Neonode may conduct user surveys. We may share any information gathered in these surveys with our affiliates, advertisers and strategic partners.

Children

Consistent with the Children’s Online Privacy Protection Act (COPPA), we do not knowingly collect PII from children under the age of 13. If you are under 13 years of age, please do not submit any personal information on or through the Site unless you have first notified your parents and have obtained their express permission to do so.

Other Websites and Services

We are not responsible for the practices employed by any websites, mobile applications or other services linked to or from our Site, including the information or content contained within them. Please remember that when you use a link to go from our Site to another website, mobile application or service, our Privacy Policy does not apply to those third-party websites, mobile application or services. Your browsing and interaction on any third-party website or service, including those that have a link on our website, are subject to that third party’s own rules and policies.

Data Breaches

If we learn of a data breach resulting in the disclosure of your PII, we will use good faith efforts to notify you of the same by email.

Changes to Privacy Policy

The Company may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of the Site or your non-cancellation of an Order (see the accompanying Terms and Conditions for our cancellation policy) after any modification to this Privacy Policy will constitute your acceptance of such modification.

Questions

If you have any questions regarding this Privacy Policy, please feel free to email us at hello@air.bar.