

PRIVACY POLICY

Privacy Statement

Neonode Technologies AB is a Swedish limited liability company with corporate registration number 556771-2095 (the “**Company**”, “**Neonode**”, “**we**”, “**us**” or “**our**”) with its registered offices at Storgatan 23 C, SE-114 55, Stockholm, Sweden. Your privacy is important to Neonode. To better protect your privacy and personal data, we provide this statement explaining our online information practices, and the choices you can make about the way your information, including cookies, 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 “**Privacy Policy**” serves to inform our users (“**User**”, “**you**”, “**your**”) of our privacy practices, policies and procedures regarding the collection, use and disclosure of your “**Personal Data**” (i.e. all kind of information that directly or indirectly can be connected to an individual User). This Privacy Policy describes how we treat the information we or our strategic partners, as further described below, collect when you visit and/or use the Site or when you place an Order. When you create or place an Order, or otherwise use this Site, you indicate that you agree to this Privacy Policy, [including any transfer of your Personal Data to countries outside the EU/EEA] and you also consent to the collection, transfer, manipulation, storage, disclosure and other uses and processing of your Personal Data as described in this Privacy Policy. Therefore, we kindly ask you to read this Privacy Policy carefully.

Please note that this Privacy Policy applies to the Company’s non-US customers and users of the Site. If you reside in the USA, 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:

- Personal Data which is collected on the Site and/or through your placing of an Order, and how the same may be used
- Sharing of Personal Data with third parties
- Use of tracking technology (e.g. “cookies”)
- Supplementing of Personal Data with information from other sources
- How you can change Personal Data you have provided
- Your right to once a year, free of charge receive information on processing of your Personal Data as well as your right to request correction in the event of incorrect information being processed
- Security measures in place

Notice of all changes that materially affect ways in which Personal Data may be used or shared will be sent to you by e-mail and posted in updates to the Company’s Privacy Policy. The updated Privacy Policy will become effective 30 days after the notification has been sent to you. Your 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 material 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 Personal Data, primarily your username, password, name, shipping address, email address, telephone number, credit card information or other billing information, communication between you and Neonode as well as information automatically collected (for example, we may use cookies and similar technologies like pixels, web beacons, and local storage that collect information about your use of the Site, interactions with our emails, and information about your computer and web browser, see a more detailed description under the section “Cookies and Log Files” below). Under certain circumstances, we may use your Personal Data, alone or together with other information, such as demographic data, that we collect from other sources (for example, we may collect information from commercially available sources such as data aggregators and social networks (such as Facebook, Google+ and Google Analytics) and public databases) to help us develop our services, tailor our communications and advertisements to you, and improve our Site.

We may use your Personal Data for the following purposes:

- Provide and administer your Order as well as 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 data analysis and research for marketing purposes as well as regarding the use of and traffic flows on our Site
- Analyze, customize and improve our products and services, as well as the content of and advertisements on the Site
- Provide customer support
- Provide information regarding drawings, competitions and special promotions that the Company may host from time to time in its sole discretion
- Display advertising
- Comply with our legal obligations (including but not limited to accounting requirements), resolve disputes with customers, enforce our Terms and Conditions and to protect, investigate and deter against fraudulent, harmful, unauthorized or illegal activity.

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 (see further under the section “Cookies and Log Files” below).

We may employ third parties to administer and provide the Services on our behalf, (including, without limitation, bill and credit card payment processing, maintenance, administration, support, hosting and database management services). These third parties may have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purposes. If you place an Order, your credit card information will be submitted through a plug-in application from a third-party gateway provider (Neonode currently engages Adyen B.V. for this purpose). The third-party gateway provider 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 your Personal Data with third parties for the purposes described above, including to parties located outside the EU/EEA.

We may share hashed portions of your Personal Data with certain strategic partners, primarily social media networks like Facebook and Google, 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 Personal Data, 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 your Personal Data in response to legal process (for example, in response to a court order). 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.

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

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

By using our Site you accept the use of cookies, web log files and similar tracking technology. 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. You can delete specific cookies at any time or disable the possibility for our Site to save cookies in your web browser. 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 on the Site. 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 Personal Data 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 by way of *inter alia* third party cookies. 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, by way of *inter alia* third party cookies, 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.

The following cookies, web beacons and similar tracking technology are used on the Site:

<u>_gat_UA-71077496-1</u>	[Google Analytics cookie, third party cookie used to differentiate between different tracking objects created in the session. The cookie is updated each time data is sent to Google Analytics. The cookie expires after 10 minutes.]
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_ga	[Google Analytics cookie, third party cookie used to identify users. This cookie is installed the first time that a user visits the Site through a browser. When the user returns to the Site using the same browser, the cookie will identify them as the same user. The user will be considered to be a different user only if the user change browsers. The cookie expires after 24 months.]
474441779410319 (Facebook Pixel)	[Facebook pixel advertising cookie (third party) used to help us reach our existing audience on Facebook and supply them with relevant content. The cookie expires after 30 days.]
_hjClosedSurveyInvites	This cookie is set once a visitor interacts with a Survey invitation modal popup. It is used to ensure that the same invite does not re-appear if it has already been shown.
_hjDonePolls	This cookie is set once a visitor completes a poll using the Feedback Poll widget. It is used to ensure that the same poll does not re-appear if it has already been filled in.
_hjMinimizedPolls	This cookie is set once a visitor minimizes a Feedback Poll widget. It is used to ensure that the widget stays minimized when the visitor navigates through your site.
_hjDoneTestersWidgets	This cookie is set once a visitor submits their information in the Recruit User Testers widget. It is used to ensure that the same form does not re-appear if it has already been filled in.
_hjMinimizedTestersWidgets	This cookie is set once a visitor minimizes a Recruit User Testers widget. It is used to ensure that the widget stays minimized when the visitor navigates through your site.
_hjDoneSurveys	This cookie is set once a visitor completes a survey. It is used to only load the survey content if the visitor hasn't completed the survey yet.
_hjIncludedInSample	This session cookie is set to let Hotjar know whether that visitor is included in the sample which is used to generate funnels.

Zendesk related cookies, for further information read here: <https://www.zendesk.com/company/customers-partners/cookie-policy/>

Website Name(s)	Cookie Name	Cookie Purpose	Cookie Duration	Category
www.zendesk.com & www.zopim.com	Optimizely	Tracking for A/B testing	10 years	
www.zendesk.com	Heap	Event tracking to monitor behavior	2 years	
www.zendesk.com	Mixpanel	Event tracking to monitor behavior	1 year	
www.zendesk.com	Gauge	High level behavior tracking	2 years	
All Websites	Google Analytics	This web analytics cookie collects information about how visitors use the Websites, which website the user came from, the number of each user's visits and how long a user stays on the Websites	2 years	
www.zendesk.com	Livefyre	Visitor authentication for commenting and user reviews	2 years	
www.zendesk.com	Disqus	Visitor authentication for commenting and user reviews	2 years	
www.zendesk.com	Crazy Egg	Analytics Tool that gives us heat maps and click data	5 years	
www.zendesk.com & www.zopim.com	Adroll	Advertising focused on retargeting	10 years	
www.zendesk.com	Bizo	Allow advertising via Display, Retargeting and other channels	5 years	

www.zendesk.com	Convertro	Multichannel analytics platform	13 years	
www.zendesk.com	Eloqua	Marketing automation software	1 year	
www.zendesk.com	Pardot	Marketing automation software	10 years	
www.zendesk.com	Quantcast	Advertising	6 months	
www.zendesk.com	Facebook Connect	Interaction between services	8 hours	
www.zendesk.com & www.zopim.com	DoubleClick	Re-targeting, optimization, reporting and attribution of online adverts	2 years	
www.zendesk.com	Advertising.com	Advertising Vendor for prospecting	2 years	
www.zendesk.com	AppNexus	Advertising Vendor for prospecting	1 year	
www.zendesk.com	Google Adwords Conversion	Advertising pixel for prospecting and retargeting	540 days	
www.zendesk.com	LiveRamp	Tracking of anonymous user characteristics	180 days	
www.zendesk.com	Twitter Advertising	Advertising	1.5 years	
www.zendesk.com	Clearbit	Stores information on user in order to not display so many forms	Session	
www.zendesk.com and www.bimeanalytics.com	Google Tag Manager	Traffic and visitor behavior measurement	2 years	

www.zopim.com and www.bimeanalytics.com	Cloudflare	Control over cache of assets	1 year	
www.zopim.com	Rlcdn.com	Ad targeting	10 years	
www.zopim.com	Smartadserv er.com	Advertising	10 years	
www.zopim.com	Bidswitch	Publisher/Ad Platform	10 years	
www.zopim.com	Pubmatic	Publisher/Ad Platform	10 Years	
www.zopim.com	Delivery.swi d.switchads. com	Advertising	10 years	
www.zopim.com	angsryr.com	Targeting/Advertising	10 years	
www.zopim.com	Adtechus.co m	Advertising	10 years	
www.zopim.com	.adnxs.com	Advertising	10 years	
www.zopim.com	iLijit.com	Advertising	10 years	
www.zopim.com	Hubspot	Advertising	10 years	
www.zopim.com	Wistia	Video Streaming	10 years	
www.bimeanalytics.com	Google Analytics	Session Google Analytics	10 minutes	
www.bimeanalytics.com	Heap Analytics	Event tracking to monitor behavior	2 years	
www.bimeanalytics.com	Heap Analytics	Session Heap Analytics	30 min	
www.bimeanalytics.com	Vimeo	Vimeo video player	2 years	
www.bimeanalytics.com	Google	Google Account – SSO	6 months	

www.bimeanalytics.com	Capterra	Conversion tracking	30 min	
www.bimeanalytics.com	Website Language	Language settings	30 min	
www.bimeanalytics.com	popupHide	Determines if a user has accepted or rejected the demo request popup that appears after a certain time on the website	Session	
Website Name(s)	Cookie Name	Cookie Purpose	Cookie Duration	
www.zendesk.com & www.zopim.com	Optimizely	Tracking for A/B testing	10 years	
www.zendesk.com	Heap	Event tracking to monitor behavior	2 years	
www.zendesk.com	Mixpanel	Event tracking to monitor behavior	1 year	
www.zendesk.com	Gauge	High level behavior tracking	2 years	
All Websites	Google Analytics	This web analytics cookie collects information about how visitors use the Websites, which website the user came from, the number of each user's visits and how long a user stays on the Websites	2 years	
www.zendesk.com	Livefyre	Visitor authentication for commenting and user reviews	2 years	
www.zendesk.com	Disqus	Visitor authentication for commenting and user reviews	2 years	

www.zendesk.com	Crazy Egg	Analytics Tool that gives us heat maps and click data	5 years	
www.zendesk.com & www.zopim.com	Adroll	Advertising focused on retargeting	10 years	
www.zendesk.com	Bizo	Allow advertising via Display, Retargeting and other channels	5 years	
www.zendesk.com	Convertro	Multichannel analytics platform	13 years	
www.zendesk.com	Eloqua	Marketing automation software	1 year	
www.zendesk.com	Pardot	Marketing automation software	10 years	
www.zendesk.com	Quantcast	Advertising	6 months	
www.zendesk.com	Facebook Connect	Interaction between services	8 hours	
www.zendesk.com & www.zopim.com	DoubleClick	Re-targeting, optimization, reporting and attribution of online adverts	2 years	
www.zendesk.com	Advertising.com	Advertising Vendor for prospecting	2 years	
www.zendesk.com	AppNexus	Advertising Vendor for prospecting	1 year	
www.zendesk.com	Google Adwords Conversion	Advertising pixel for prospecting and retargeting	540 days	
www.zendesk.com	LiveRamp	Tracking of anonymous user characteristics	180 days	
www.zendesk.com	Twitter Advertising	Advertising	1.5 years	

www.zendesk.com	Clearbit	Stores information on user in order to not display so many forms	Session	
www.zendesk.com and www.bimeanalytics.com	Google Tag Manager	Traffic and visitor behavior measurement	2 years	
www.zopim.com and www.bimeanalytics.com	Cloudflare	Control over cache of assets	1 year	
www.zopim.com	Rlcdn.com	Ad targeting	10 years	
www.zopim.com	Smartadserv er.com	Advertising	10 years	
www.zopim.com	Bidswitch	Publisher/Ad Platform	10 years	
www.zopim.com	Pubmatic	Publisher/Ad Platform	10 Years	
www.zopim.com	Delivery.swi d.switchads.com	Advertising	10 years	
www.zopim.com	angsryr.com	Targeting/Advertising	10 years	
www.zopim.com	Adtechus.co m	Advertising	10 years	
www.zopim.com	.adnxs.com	Advertising	10 years	
www.zopim.com	iLijit.com	Advertising	10 years	
www.zopim.com	Hubspot	Advertising	10 years	
www.zopim.com	Wistia	Video Streaming	10 years	
www.bimeanalytics.com	Google Analytics	Session Google Analytics	10 minutes	
www.bimeanalytics.com	Heap Analytics	Event tracking to monitor behavior	2 years	Analytics

www.bimeanalytics.com	Heap Analytics	Session Heap Analytics	30 min	Analytics
www.bimeanalytics.com	Vimeo	Vimeo video player	2 years	Functionality/ Preference
www.bimeanalytics.com	Google	Google Account – SSO	6 months	Functionality/ Preference
www.bimeanalytics.com	Capterra	Conversion tracking	30 min	Targeting/ Advertising
www.bimeanalytics.com	Website Language	Language settings	30 min	Functionality/ Preference
www.bimeanalytics.com	popupHide	Determines if a user has accepted or rejected the demo request popup that appears after a certain time on the website	Session	Functionality/ Preference

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.

Children

We do not knowingly collect Personal Data from children under the age of 18. If you are under 18 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 Personal Data, 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. Notice of all changes that materially affect ways in which Personal Data may be used or shared will be sent to you by e-mail and posted in updates to the Company's Privacy Policy. The updated Privacy Policy will become effective 30 days after the notification has been sent to you. Your continued use of the Site and/or your non-cancellation of your Order (see accompanying Terms and Conditions regarding our cancellation policies) will constitute your acceptance of such modification.

Your rights

You are entitled to once a year, free of charge, after a written and signed request obtain information on whether we are processing your Personal Data. If your Personal Data is being processed, you are also entitled to obtain information regarding what Personal Data is being processed, the purposes of the processing, the source and recipients or categories of recipients to whom the data is disclosed.

You may also contact us to access, update and correct your personal information or if you have any questions about our Privacy Policy. Please see our contact information below. Neonode makes good faith efforts to provide you with such access or correction if it is not otherwise restricted by applicable data protection regulations. Neonode will either on your specific request, or on its own initiative, correct, block or delete information that is not correct.

Neonode will retain Personal Data for as long as needed in order to perform the purposes for which they were collected. Your Personal Data will not be kept longer than necessary.

Questions

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

Data controller:

Neonode Technologies AB
Box 5082
102 42 Stockholm
+46 8 667 17 17
hello@air.bar
Company reg. no 556771-2095