

Chamberlain Privacy Statement

Effective as of July 1, 2013

I. Introduction

Privacy is very important to Chamberlain®. This Privacy Statement applies to information that Chamberlain collects or that you provide to Chamberlain about you or your Device (as defined below) through your use of or registration for Chamberlain’s website (the “**Website**”), or your use of the System or the Services (as each is defined below). This Privacy Statement explains how we collect, access, hold, use and disclose this information. This Privacy Statement does not pertain to information collected in any other manner or offline.

Chamberlain’s proprietary Gateway System (the “**Chamberlain Gateway System**”) includes (A) the web-based and mobile web user interfaces for the system that may be made available by Chamberlain or its affiliates from time to time (“**Web Interfaces**”), (B) the mobile device applications that may be made available from time to time by Chamberlain or its affiliates for use in connection with the system (“**Mobile Apps**”), and (C) the firmware, software and functionality embedded or contained in or otherwise provided by a Chamberlain Gateway device or any other Chamberlain-approved interface device (each, a “**Device**”; such firmware, software and functionality, “**Device Code**”) for use in connection with your garage door opener or other product that is supported by the Chamberlain Gateway System (collectively, the “**System**”). Chamberlain may also provide certain services through the System (“**Services**”).

For purposes of this Privacy Statement, “**Personal Information**” means individually identifiable information about you.

II. Information Collected by Chamberlain

Chamberlain collects certain information from you, your Devices, and your use of the System (including any Mobile Apps) and through the Services. By using a Device, the System or the Services, or by providing Personal Information to Chamberlain or its affiliates, you consent to Chamberlain’s collection, storage, use, disclosure, sharing and processing of your Personal Information and other data as described in this Privacy Statement.

1. Information that You Provide to Chamberlain

When you register your Device or you register for the Services, whether through the Website or through the Mobile Apps, or when you subscribe to newsletters or other communications from Chamberlain or its affiliates, or when you send us emails or other communications (such as by filling out a form on the Website), you provide Personal Information to Chamberlain, including, but not limited to, your name, address, zip code, email address, and phone number, and, if applicable, payment information. In addition, if you enter any contest, sweepstake or other promotion that we may run on the Website, you may provide us with information, including your contact information (such as email address), demographics information (such as zip code, age, or income level) and other information (such as information about your garage door operation

usage).

2. Passive Collection of Information by Chamberlain

While you are on the Website, we automatically track information related to your use of the Website. This information may include, among other things, URL tracking information, information about your browser, your IP address, any files you download or view, your path through the Website, the date, time and frequency you spend accessing the Website and the length of time you spend reviewing certain features. We may also track usage through cookies. A cookie is a small data file written to a user's hard drive. Cookies may be used, among other things, to allow automated log-in and may contain information such as a login ID or other information about your preferences or Internet use.

If you use a Device, Chamberlain may collect information from your Device in order to provide you with the Services, including monitoring your garage door operation and Device status.

In addition, if you use a Mobile App, Chamberlain may automatically collect additional information from you related to your smart phone or other mobile device and your use of the Mobile App, including, without limitation, the numbers of times you access the Mobile App, your unique device identifier, email address, name, geo-location, mobile phone number, and may connect to your text messages or email or your contacts or address book to provide you with the Services.

For purposes of this Privacy Statement, except as otherwise required by applicable law, Personal Information will not be deemed to include (i) information passively collected through the Website, a Device or a Mobile App, or (ii) aggregate or combined information (including information that relates to you but that does not specifically identify you).

III. Use and Sharing of Information Collected by Chamberlain

1. Internal Use

Chamberlain uses the information we collect to improve our marketing and promotional efforts, to statistically analyze usage of the Website, to improve our content and offerings on the Website, to customize the content and layout of the Website.

In addition, Chamberlain may use your Personal Information and other information that we collect from your use of the Website (including any emails you may send us), the Services, your Device and Mobile Apps to provide you with Services, for troubleshooting and maintenance, to communicate with you about your account or Device, to offer you products and services. Chamberlain may also share your Personal Information and other information we collect from you with third parties that provide us with services in connection with our provision of Services or that are otherwise acting on our behalf, such as hosting providers, call center operators, shippers, servicers, people who analyze data for us, etc.

2. Special Offers

If you register for contests, sweepstakes and other promotions on the Website, your information (including Personal Information) will be used for internal purposes and to provide you with

information (including but not limited to information about products or services) that may be of interest to you. We may use your information to deliver information that, in some cases, is targeted to your interests, such as targeted banners, new services and promotions. We may use your email address, mailing address or phone number to contact you regarding administrative notices. In addition, your information may be added to the Chamberlain special promotions mailing list (of which you may opt-out) in order to provide you with information about Chamberlain products and special offers from Chamberlain, and may be provided to third parties regarding products or services that may be of value to you (of which you may opt-out).

If you choose not to enter any contests, sweepstakes or other promotions on the Website, you may still sign up on the Website to be added to Chamberlain's special promotions list and/or receive promotional material from third parties.

3. Disclosure to Third Parties

Chamberlain may disclose your Personal Information and other information to our affiliates, advertisers or other third parties for marketing and promotional (of which you may opt-out). If you do not opt-out, we may also share your Personal Information and other information with our co-sponsors and business partners. We work with these companies to offer products or services that we believe may be valuable or useful to you. However, even if you opt-out of our sharing, that opt-out does not apply to our sharing of your information (including your Personal Information and any information related to the Services, such as service desk tickets) with our affiliates or with third parties that provide services directly to you, Chamberlain or our affiliates in connection with our provision of the System or the Services. Such third parties may use the information shared with them to provide these services and for marketing, advertising or other purposes, subject to their respective privacy policies.

In addition, Chamberlain may aggregate or combine the data we collect from our users (which does not include your Personal Information) and share it with our business partners and other third parties. This aggregated or combined data may be used by Chamberlain or the third parties for research purposes and for statistical purposes, among other uses.

Chamberlain reserves the right to disclose your information (including your Personal Information) when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) Chamberlain's rights or property, or anyone else that could be harmed by such activities. Chamberlain may also disclose your information (including your Personal Information) if a Website, Mobile App or other policy violation has occurred or to enforce the Chamberlain License Agreement and Terms of Use (available at <https://www.mychamberlain.com/assets/docs/ChamberlainLicenseAndTermsOfUse.pdf>

). If Chamberlain is involved in any merger, acquisition, sale of company assets, transition of service to another provider, or insolvency, bankruptcy or receivership, we reserve the right to transfer your information (including your Personal Information) in connection with such transaction.

Chamberlain cooperates with law enforcement agencies in identifying those who use the Website, Mobile App, Device or Services for illegal activities. Therefore, Chamberlain responds to subpoenas, warrants or other court orders regarding information concerning any users. We will, at our discretion, disclose information if we believe we are required to do so by law, believe that such disclosure is necessary to protect us from legal liability or believe we need to do so

protect someone's safety or the integrity of the Website, Mobile Apps, Device, or Services.

IV. Review and Correction of Personal Information

You may review, correct and update certain Personal Information (such as your name and contact information) by contacting Chamberlain through the "Contact Us" section below or by logging in to your account on the Website or through the Mobile App and updating the applicable fields.

V. Opting-Out

You may opt-out from having your Personal Information shared with third parties for marketing purposes by contacting us through the information provided below in "Contact Us". You may opt-out of email marketing communications from Chamberlain by either (i) clicking on the "Unsubscribe" link provided in the applicable marketing email and following the directions provided, or (ii) contacting us through the information provided below in "Contact Us". Note that even if you opt-out, Chamberlain reserves the right to contact you in the event of a service or safety notification or to respond to your communications with us.

VI. Exclusions

1. Children

The Website is generally not intended for use by children. We may have features on the Website that are designed to educate children through a fun activity, such as our coloring book regarding garage door safety. These features do not involve the collection of Personal Information regarding children. We do not knowingly solicit nor collect any Personal Information about children under the age of 13 nor market to them. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. To do so, contact Chamberlain through the information provided below in the "Contact Us" section.

2. Other Sites and Third Parties

The Website and Mobile Apps may contain links to websites owned by other companies. Chamberlain does not control or endorse and is not responsible for the privacy practices of other sites or third parties to whom you may link from the Website or Mobile Apps. In addition, this Privacy Statement is not intended to describe data handling procedures for information collected by other linked websites or business partners.

3. Non-U.S. Residents

If you live outside the United States (including in the European Economic Area), and you use our Services, Website, and Mobile Apps, or provide us with Personal Information directly via the Website and/or Mobile Apps, such information will be handled in accordance with this Privacy Statement. By using the Website and Mobile Apps or giving us your Personal Information, you are directly transferring your Personal Information and other information to us in the United States. The United States may not have the same level of data protection as your jurisdiction. However, you agree and consent to our collection, transfer, and processing of your Personal Information and other information in accordance with this Privacy Statement and subject to United State laws. You are solely responsible for compliance with any data protection

or privacy obligations in your jurisdiction when you use the Services, Website and Mobile Apps, or provide us with Personal Information. Regardless of where we transfer your information, we still protect your information in the manner described in this Privacy Statement.

VII. Security

Chamberlain is committed to maintaining the security of the data you provide us. However, please note that there is always some risk in transmitting information over the Internet. Because the Website, the Mobile Apps, the System and the Services are provided through wireless networks and the Internet, when you use the Website, the Mobile Apps, the System or the Services, your communications may be intercepted by others. For this reason, Chamberlain cannot guarantee the security and privacy of wireless transmissions or transmissions via the Internet, and we will not be liable for any lack of security relating to the use by you of the Website, the Mobile Apps, the System or the Services. You agree that you will not hold Chamberlain liable for any damages resulting from any loss of privacy or security occurring in connection with any communications over such networks.

VIII. California Residents: Your California Privacy Rights

California law permits customers of Chamberlain who are California residents to request and receive certain information regarding Chamberlain’s disclosure of Personal Information to third parties for their direct marketing purposes, and your choices with respect to such disclosures. To make such a request, please contact us through the information provided below in “Contact Us.”

IX. Contact Us

The operator of this site is The Chamberlain Group, Inc., 845 Larch Avenue, Elmhurst, Illinois, 800-528-5880 (US) or 0049 6838 907 172 (DE).

If you have any questions regarding Chamberlain’s Privacy Statement, please contact us at the above phone number.

X. Updates to Privacy Statement

This Privacy Statement is subject to the Chamberlain License Agreement and Terms of Use. Chamberlain reserves the right to change this Privacy Statement at any time, and Chamberlain is under no obligation to provide you notice of such modifications via email or other communication. Any changes to this Privacy Statement will be posted to this page as soon as reasonably possible and we will note near the top of this page the date that any changes are made and/or when they become effective. Therefore, please check this page periodically. Use of the Chamberlain Website, the Mobile Apps, the System or the Services constitutes consent to any policies then in effect.

Canadian Provisions

If you are a resident of Canada, the following provisions (the “**Canadian Provisions**”) apply in addition to Articles I – X above of the Chamberlain U.S. Privacy Statement. In the event of a conflict between any of the Canadian Provisions and Articles I – X above, the Canadian

Provisions govern.

The definition of “Personal Information” in Article I is deleted and is replaced with the following:

“Personal Information” means any information about an identifiable individual.

All references to your “zip code” are replaced by the words “postal code”.

With respect to passive collection of Personal Information by Chamberlain described in Section 2 of Article 2 of the Chamberlain U.S. Privacy Statement, the 4th paragraph of Section 2 of Article 2 is deleted and replaced with the following:

For purposes of this Privacy Statement, except as otherwise required by applicable law, Personal Information will not be deemed to include (i) information passively collected through the Website, a Device or a Mobile App if such information does not identify an individual or could not be linked to an individual, or (ii) anonymous aggregate or combined information that relates to you but that does not specifically identify you.

The first paragraph of Section 3 of Article III is deleted and replaced with the following:

Chamberlain may disclose your Personal Information and other information to its affiliates, advertisers, co-sponsors, business partners or other third parties and their successors and assigns for marketing and promotional (of which you may opt-out). We work with these companies to offer products or services that we believe may be valuable or useful to you. However, if you opt-out of our sharing of your personal information for marketing purposes as described above, this opt-out does not apply to our sharing of your information (including your Personal Information and any information related to the Services, such as service desk tickets) with our affiliates or with third parties that is necessary to provide services directly to you, in connection with our provision of the System. Such third parties may use the information shared with them to provide these services, subject to their compliance with Chamberlain’s privacy policy.

The second paragraph of Section 1 of Article III is deleted and replaced with the following:

In addition, Chamberlain may use your Personal Information and other information that we collect from your use of the Website (including any emails you may send us), the Services, your Device and Mobile Apps to provide you with Services, for troubleshooting and maintenance, to communicate with you about your account or Device, to offer you products and services. Chamberlain may also share your Personal Information and other information we collect from you with its affiliates, related entities and other third parties that provide us with services in connection with our provision of Services or that are otherwise acting on our behalf, such as hosting providers, call center operators, shippers, servicers, people who analyze data for us, etc.

The third paragraph of Section 3 of Article III is deleted and replaced with the following:

Chamberlain reserves the right to disclose your information (including your Personal Information) when we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing

injury to or interference with (either intentionally or unintentionally) Chamberlain's rights or property, or anyone else that could be harmed by such activities. Chamberlain may also disclose your information (including your Personal Information) if a Website, Mobile App or other policy violation has occurred or to enforce the Chamberlain License Agreement and Terms of Use (available at <https://www.mychamberlain.com/assets/docs/ChamberlainLicenseAndTermsOfUse.pdf>

). If Chamberlain is involved in any merger, acquisition, sale of company assets, transition of service to another provider, or insolvency, bankruptcy or receivership, we reserve the right to transfer your information (including your Personal Information) in connection with such transaction to potential buyers and their professional advisors, under an obligation of confidentiality.

The following is added to Article IV:

You have the right at any time, upon written request, to be informed of the existence, uses and disclosures that have been made of your Personal Information and to have access that information. Where your requests involves a substantial number of records, we reserve the right to charge a reasonable fee for compiling and copying those records to provide them to you. You may contact us at the address set out in Article IX.

Section 3 of Article VI is deleted and replaced with the following:

If you live outside the United States (including in the European Economic Area), and you use our Services, Website, and Mobile Apps, or provide us with Personal Information directly via the Website and/or Mobile Apps, such information will be handled in accordance with this Privacy Statement. By using the Website and Mobile Apps or giving us your Personal Information, you are directly transferring your Personal Information and other information to us in the United States. The United States may not have the same level of data protection as your jurisdiction. In addition, Personal Information held within the United States may be subject to access by law enforcement authorities in the exercise of their duties, in some cases without notice to you, either before or after the access. However, you agree and consent to our collection, holding transfer, and processing of your Personal Information and other information in accordance with this Privacy Statement and subject to United State laws. Regardless of where we transfer your information, we still protect your information in the manner described in this Privacy Statement.