

PRIVACY POLICY

Aegis

Last Updated: July 9, 2026

1. Introduction

This Privacy Policy explains how Terrapin Tech Solutions, LLC, a limited liability company organized under the laws of the State of South Carolina, United States ("Company," "we," "us," or "our") collects, uses, discloses, and protects information when you use the Aegis mobile application and related services (the "Service"). Aegis is a group communication and travel safety platform that shares certain information — including your location — with other members of your travel Group and with your Group's designated Safety Administrator(s). This Policy applies to all users globally; where local law provides additional or different rights, we honor those rights as described in Section 9.

2. Information We Collect

2.1 Information You Provide

- Account information: name, email address, phone number, password, profile photo.
- Group and Trip information: the Groups and Trips you join or create, your role (Group Member, Trip Organizer, or Safety Administrator), and any Trip details entered (e.g., destination, dates).
- Content you submit: messages, status updates, photos, and check-ins shared with your Group.
- Emergency/contact information you or your Trip Organizer choose to provide (e.g., an emergency contact name and number).

2.2 Information Collected Automatically

- Device information: device type, operating system, unique device identifiers, IP address, mobile network information.
- **Location data (including continuous/background location):** with your permission, we collect precise GPS location on an ongoing basis, including when the app is not actively in use. This is the core mechanism used to power Group coordination features and to generate automated alerts to your Group's Safety Administrator(s) — for example, when you appear to have become separated from the Group or have been alone for an extended period. You will be shown a clear, separate disclosure and prompted for permission before continuous location tracking is enabled, consistent with Apple App Store and Google Play requirements. You can disable this at any time in your device settings, though doing so will limit or disable Group coordination and alert features.
- Usage data: features used, session duration, crash logs, and other analytics.
- Cookies and similar technologies: as described in Section 8.

2.3 Information from Third Parties

- Information from push notification, messaging, and mapping infrastructure providers necessary to deliver the Service.
- Information provided by a Trip Organizer or Safety Administrator when adding you to a Group (e.g., your name or phone number, for the purpose of sending you an invite).

3. How We Use Information

- To provide, operate, and maintain the Service, including Group messaging and status sharing;
- To generate and deliver automated location-based alerts to Safety Administrators, such as separation-from-group or alone-for-an-extended-period notifications;
- To communicate with you about your account, your Groups, and customer support requests;
- To detect, prevent, and address misuse, fraud, and security incidents (for example, someone falsifying alerts or status updates);
- To comply with legal obligations;
- To improve and develop the Service, including through aggregated or de-identified analytics.

We do not use your location or Trip data to serve third-party advertising, and we do not sell your personal information.

4. Legal Bases for Processing (EEA/UK Users)

Where the GDPR or UK GDPR applies, we rely on the following legal bases:

- **Consent:** for continuous/background location tracking and for sharing your location and status with your Group and Safety Administrator(s); you may withdraw consent at any time without affecting the lawfulness of prior processing.
- **Contract:** to provide the Group communication and safety-alert features you sign up for.
- **Legitimate interests:** for fraud and misuse prevention, service improvement, and analytics, balanced against your rights and interests.
- **Legal obligation:** for compliance with applicable law.

5. Sharing Within Your Group — Please Read

Unlike most of the sharing described elsewhere in this Policy, this section describes information shared with other private individuals — not just with the Company or its vendors. When you join a Group, your location, status updates, and messages are visible to other Group Members and to the Group's designated Safety Administrator(s), as configured by that Group. Only join a Group you trust.

- **Safety Administrator(s):** receive your real-time location, status, and automated alerts (e.g., separation or alone-status notifications) for the duration of the Trip, in order to fulfill their safety-monitoring role.
- **Other Group Members:** may see your general status and location within the Group interface, depending on the Group's configuration and your device settings.
- **Leaving a Group:** you may leave a Group at any time, which stops further sharing of your location and status with that Group going forward.

6. How We Share Information (With the Company's Service Providers and Others)

- **Service providers:** hosting, push notification, analytics, and customer support vendors acting on our behalf under contractual confidentiality and security obligations.

- **Legal and safety:** where required by law or legal process, or to protect the rights, property, or safety of the Company, our users, or others.
- **Business transfers:** in connection with a merger, acquisition, financing, or sale of assets.
- **With your consent:** for any other purpose disclosed to you at the time of collection.

We do not sell your personal information. Depending on your jurisdiction, certain data-sharing arrangements with analytics partners may still be considered a "sale" or "share" under laws such as the CCPA/CPRA; see Section 9 for your opt-out rights.

7. International Data Transfers

The Company is based in the United States (State of South Carolina), and your information is generally processed and stored in the United States, as well as in other countries where our service providers operate. If you are located in the European Economic Area, the United Kingdom, or another jurisdiction with data transfer restrictions, your information will be transferred to the United States, which may not have data protection laws equivalent to those in your home jurisdiction. Where required, we use appropriate safeguards for such transfers, such as Standard Contractual Clauses approved by the European Commission, the UK International Data Transfer Addendum, or other approved transfer mechanisms.

8. Data Retention

We retain personal information, including location and Trip history, for as long as necessary to provide the Service, resolve disputes, and comply with legal obligations. Location and status data associated with a completed Trip is retained for one-year (12 months) before being deleted or anonymized, unless retained longer at the direction of a Trip Organizer or as required by law. When no longer needed, we delete or anonymize the information.

9. Cookies and Tracking Technologies

We and our service providers use cookies, SDKs, and similar technologies to operate the Service, remember preferences, and measure performance. You can manage cookie preferences through your browser or device settings, and where required by law, we will present a cookie consent mechanism for non-essential cookies.

10. Your Privacy Rights

10.1 EEA/UK Users (GDPR)

Subject to certain conditions and exceptions, you have the right to access, rectify, erase, restrict, or object to processing of your personal information, request data portability, withdraw consent at any time, and lodge a complaint with your local data protection authority.

10.2 California Users (CCPA/CPRA)

If you are a California resident, you have the right to know, delete, and correct your personal information; to opt out of any sale or sharing of personal information and out of targeted advertising; to limit the use of sensitive personal information (such as precise geolocation); and to not be discriminated against for

exercising these rights. To exercise these rights, submit a request via wmurff@terrapintechsolutions.com; we will verify your identity before responding.

10.3 Other Jurisdictions

Users in other countries have rights that may be similar to those above under applicable local law. Contact us using the details in Section 13, and we will respond in accordance with the law applicable to you.

11. Minors and Group Trips Involving Minors

The Service is not directed to children under 16 as independent Users, and we do not knowingly collect personal information directly from them outside the context described below. However, the Service is designed to also support group trips that include minors (for example, school, youth, or family trips), where a minor participates as a Group Member under the supervision of an adult Trip Organizer or Safety Administrator (such as a teacher, chaperone, camp staff member, or parent/guardian).

- In these cases, the organization or adult responsible for the trip is responsible for obtaining any legally required parental or guardian consent before a minor's information (including location) is collected through the Service, and for supervising the minor's use of the app.
- A minor's location and status information collected in this context is shared with the Trip's designated Safety Administrator(s) for safety-monitoring purposes, consistent with Section 5.
- Parents or guardians who have questions about a minor's participation in a Trip, or who believe a minor's information has been collected without appropriate consent, may contact us using the details in Section 13, and we will work with the responsible organization to address the request.

12. Security

We implement technical and organizational measures designed to protect your information, including encryption in transit, access controls, and regular security assessments. **HOWEVER, NO METHOD OF TRANSMISSION OR STORAGE IS COMPLETELY SECURE, AND WE CANNOT GUARANTEE ABSOLUTE SECURITY.**

13. Changes to This Policy

We may update this Privacy Policy from time to time. Material changes will be notified through the app or by email prior to the effective date. Your continued use of the Service after changes take effect constitutes acceptance of the revised Policy.

14. Contact Us

If you have questions about this Privacy Policy or wish to exercise your privacy rights, please contact us at:

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Mt. Pleasant, South Carolina
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