

Privacy Policy

Last Updated: August 1, 2025

Overview

This privacy notice ("Privacy Notice") is intended to help you ("you" or "your") understand how Flock Group Inc d/b/a Flock Safety and its subsidiaries and affiliates ("Flock," "we," "us" or "our") collect, use disclose, and safeguard the information you provide to us via (1) the Flock website located at <http://www.flocksafety.com>, including, without limitation, all sub-domains thereof on which this Privacy Notice is posted (collectively, the "Site") and (2) the Flock Services. All terms not defined herein shall have the meaning set forth in our "Terms and Conditions" located [here](#).

By using or accessing the Site and/or the Flock Services, you signify your acknowledgment and consent to the collection, use, and disclosure of your Personal Information (as defined below) in accordance with this Privacy Notice. If you do not agree to this Privacy Notice, please do not use or access the Site and/or the Flock Services. Flock may revise this Privacy Notice at any time by updating this posting. We will keep this Privacy Notice under regular review and will provide any updates here. The "Last Updated" section at the top of this Privacy Notice states when this notice was last updated. We encourage you to periodically review this Privacy Notice to stay informed about how we collect, use, and share Personal Information.

Disclosure

By logging into the Site, you acknowledge that you are accessing a restricted information system. All system usage may be monitored, recorded, and subject to audit. This monitoring relates solely to system performance and usage patterns. It does not include access to or monitoring of Customer Data. Unauthorized use of the system is prohibited and subject to criminal and civil penalties; and any use of the system indicates consent to monitoring and recording. As applicable, you agree to comply with the CJIS Security Addendum promulgated by the FBI.

Collection of Personal Information

The purpose of this Privacy Notice is to inform you of the Personal Information Flock collects, how we use it, and to describe your rights or options regarding such use. For clarity, personal information, as used in this Privacy Notice, means information that can be used to identify you, directly or indirectly, alone or together with other information ("Personal Information"). This may include things such as your full name, contact information, email address, mailing address, phone number, device IDs, certain cookie and

network identifiers, and any content captured by our products that may be used to identify an individual.

We gather various types of Personal Information from our users, as explained in more detail below, and we use this Personal Information internally in connection with the Flock Services, including to administer, operate, and/or improve the Flock Services, to allow you to set up a user account and profile, to provide you with a better Site navigation experience, to contact you and allow other users to contact you with information relevant to your use of or interaction with the Flock Services, and to fulfill your requests or inquiries. If you visit the Site, you may generally do so without providing any Personal Information. However, there are cases in which we may ask you for Personal Information. For example, we will occasionally conduct online surveys to better understand the needs and profiles of our Site visitors. In addition, we may request Personal Information when you register to receive additional information regarding Flock Services and/or products, download software, sign up for a newsletter, demo, or send us a question. Even if you choose not to provide the information we request, you can still visit most of the Site, but you may be unable to access certain options, offers, and services. In case you change your mind or wish to update or delete your Personal Information, we will make reasonable efforts to correct, update, or remove your Personal Information in compliance with applicable privacy laws. You can use our online form to submit your request by clicking the link at the bottom of this Privacy Notice.

Flock complies with the EU-U.S. Data Privacy Framework ("EU-U.S. DPF") as set forth by the U.S. Department of Commerce. Flock has submitted to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF. If there is any conflict between the terms in this Privacy Notice and the EU-U.S. DPF Principles, the EU-U.S. DPF Principles shall govern. Flock is subject to investigatory and enforcement powers of the U.S. Federal Trade Commission. To learn more about the Data Privacy Framework (DPF) program, please visit <https://www.dataprivacyframework.gov/>.

Your Flock Hardware and Other Flock Products

Information Input During Setup: When you set up your account, you may be asked for certain basic information, including, but not limited to, your device name, description, and geolocation. This information is used to personalize your experience (e.g., to tell you which device is triggering a notification). For purposes of this Privacy Notice, "device" refers to any tool used to access the Flock Services and/or products.

Environmental Data from Sensors: We collect data from sensors built into some of our devices or products installed. These sensors collect data such as device temperature and ambient light. By recording this information, your device can know, for instance, to turn on night vision if it is dark outside.

Video, Images and Audio Signals and Data: After you begin using your device, we may process information from your device, so that we can send you alerts such as when a suspect vehicle passes the device. When you access the Flock Services, you will have access to images, video, and/or audio recordings from your device, depending on the product. Additionally, we will capture, process, and store images, video, and/or audio recordings from your device for the duration of your designated retention period. You will have access to this data through the Flock Services during your subscription, in accordance with the applicable data retention period. However, to ensure access, you must download them before the retention period ends, as they will no longer be available thereafter.

Technical Information from the Device: In order to improve your experience over time and help troubleshoot any problems you may encounter with your device, we may record technical information from your device such as software version and cellular signal strength.

Saved and Shared Content: You may save and choose to share certain content like video/audio clips, images, captions, and comments for other people to access using the Flock Services. We will collect and store information that will allow us to save or share your content, as directed by you through the Flock Services and in accordance with your terms and conditions.

Training Data: We may use a small fraction (less than 1%) of images captured by Flock Services, which are stripped of all metadata and identifying information, for the limited purpose of improving our products and services through machine learning (“Training Data”). Training Data is used internally to help our systems better recognize vehicles, objects, and descriptions. For example, if a new Red Ferrari is released, we may use de-identified images of that vehicle to teach our system to accurately distinguish it from other vehicles, such as a Red Lamborghini. These images are never sold or shared with third parties. To protect your privacy, Training Data is maintained separately and is never combined in a way that could render it personally identifiable. Use of Training Data is essential to ensure the accuracy and effectiveness of our services.

Data protection and privacy laws in your jurisdiction may impose certain responsibilities on you and your use of our products. You are responsible for ensuring that you comply with all

applicable laws when you use the Flock Services or products, including, where so required, to execute a mutually agreed upon data protection agreement. Please note that recording and sharing content involving other people may affect their privacy and/or data protection rights.

Distinction Between Personal Information Captured Via the Site and Customer Data Captured by Flock Hardware

Flock Hardware captures video and images in public spaces where there is no reasonable expectation of privacy. This is referred to in our Terms and Conditions as Footage. While privacy laws grant individuals certain rights over their Personal Information (such as access, deletion, or correction), it is important to distinguish those rights from information captured in public spaces. Flock's Footage does not contain Personal Information that connects that image to an identifiable individual. As a result, Flock cannot verify the identity of individuals whose effects (i.e., license plates) appear in the Footage and are unable to process data subject requests related to such images.

Flock's Security Practices Regarding Customer Data

Flock's security posture for Customer Data starts before the devices are even installed. Flock has a dedicated team, which maps out the best location for installation, all of which require that installations are in accordance with constitutional rights. This means that Flock's devices are never placed in a location where there is a reasonable expectation of privacy.

Footage is collected on Flock's devices and transmitted from devices to Amazon Web Services using encryption in transit and stored within an Amazon's Simple Storage Service (S3) (organized according to customer lifecycle needs) for thirty (30) days, or as long as required by applicable law or regulation, and then permanently deleted. Direct access to this data is managed through AWS Identity Access Management policies and roles. Customer Data is encrypted throughout the entire lifecycle and transmitted using TLS 1.2 or better and stored securely using AES256 encryption. Customer Data collected on Flock's devices is stored locally until the device reaches storage capacity, or 7 days, whichever is sooner. While stored in the cloud, all data (both footage and metadata) is fully encrypted at rest using AES256.

Customer Data is owned by the Customer and only shared as directed by the Customer. Any license plate data that may be searched by authorized law enforcement requires justification to verify the legitimacy of the search and create an audit trail. Lastly, Flock offers law enforcement Customers training on how to properly use our system and best practices to communicate with their dispatch teams. Such users must learn how to enter

legitimate reasons for search and how to audit searches as necessary. Customer Data is securely stored, transmitted, and deleted, and any law enforcement access is contingent on authorized use. For more information on how Flock prioritizes your security, please visit our [Trust](#) page.

Use of Personal Information

Other than as required to perform the Flock Services, as disclosed to you when the information is collected, as required by Law, or as described in this Privacy Notice, Flock does not rent, sell, or otherwise distribute your Personal Information to third parties (without your consent).

Flock collects certain Personal Information about you to operate our business, which may include Personal Information contained in legal agreements (e.g., commercial agreements, NDAs, invoices, etc.), financial information relating to payments, receivables, and fulfillment (e.g., banking information, credit card or other account numbers, addresses, phone numbers, etc.), professional or employment-related information, (e.g., job applications, resumes, education and work history details, background check results, references, etc.), and employee benefit information (e.g., stock or equity ownership information, benefit elections, personal information about dependents, medical histories, contact information, etc.).

We may collect and use your Personal Information, including your mobile phone number, to communicate with you via SMS/text message for operational or support purposes, and, with your prior express consent where required by law, for promotional or marketing purposes, in accordance with applicable laws. By providing your mobile number, you consent to receive such operational and support-related messages from Flock and its subsidiaries and affiliates. Standard message and data rates may apply. You may opt out of receiving promotional text messages at any time by following the instructions provided in the message.

Personal Information provided by users may be used for marketing and promotional purposes by Flock and its subsidiaries and affiliates. You may change these settings by selecting the “Your Marketing and Advertising Choices” link at the bottom of this Privacy Notice.

Accountability for Onward Transfer

Flock complies with the Data Privacy Framework (DPF) Principles, including the onward transfer liability provisions, for all transfers of Personal Data from the EU. Flock will only transfer such Personal Data to third parties where: (a) the third party has provided written assurances that it will handle the data in a manner consistent with this Notice and the

applicable DPF Principles; or (b) the third party is located in a jurisdiction recognized by the European Commission (or relevant authority) as providing an adequate level of data protection.

If Flock becomes aware that a third party is processing Personal Data in a manner inconsistent with this Notice or the DPF Principles, it will take reasonable steps to prevent or remediate the misuse.

We may share Personal Data with both affiliated and unaffiliated third parties acting as sub-processors, such as IT infrastructure providers, cloud storage vendors, or analytics services, to support our operations. Flock remains liable for any onward transfer to such third parties if they process Personal Data in violation of the DPF Principles, unless the Flock proves that it is not responsible for the event giving rise to the damage.

In addition, Personal Data may be disclosed in the context of a corporate transaction, including a merger, acquisition, divestiture, restructuring, or sale of assets, where such data is part of the transferred business operations.

Data Retention

We will only retain Personal Information for as long as needed for the specific purpose in which it was collected, or as required by applicable law or regulation. For more information on how long a certain data set is retained, please contact us at privacy@flocksafety.com.

Cookies and IP Tracking

This Site may use the following category of cookies for marketing, analytic, personalization, and essential purposes: strictly necessary cookies, performance cookies, targeting cookies, and functional cookies. If, for any reason, you do not wish to take advantage of cookies, you may have your browser not accept them, although this may disable or render unusable some of the Site's features. The Site may also detect and use your IP address or domain name for internal traffic monitoring and capacity purposes or to otherwise administer our website. No Personal Information is obtained; rather, the patterns of usage of our various users may be tracked to provide you with improved service and content based on aggregate or statistical reviews of user site traffic patterns. You may change your cookie settings by selecting the "Your Cookie Choices" link at the bottom of this Privacy Notice.

This Site uses cookies and similar technologies to collect personal information, such as IP addresses, device identifiers, and browsing behavior, for the following purposes:

- **Strictly Necessary Cookies:** Enable core functionality, such as navigation. These cannot be disabled and are retained for your session.

- **Performance Cookies:** Collect anonymized data to improve Site performance. Data is retained only as long as necessary, typically up to 12 months.
- **Targeting Cookies:** Used by third-party partners (e.g., Google Ads) for personalized ads. Data is retained only as long as necessary, typically up to 24 months.
- **Functional Cookies:** Enhance features like remembering preferences. Data is retained only as long as necessary, typically up to 12 months.

We collect IP addresses and domain names, considered personal information under the California Privacy Rights Act (CPRA), for internal traffic monitoring and Site administration. This data is retained only as long as necessary and may be aggregated for analytics. You may opt out of the sale or sharing of your personal information, including for targeted advertising, via our “Do Not Sell” button on our website or by contacting us with the details listed at the bottom of this Privacy Notice.

Special Cases

Flock reserves the right to disclose Personal Information in special cases, when we have reason to believe that disclosing this information is necessary to bring legal action against someone who may be causing injury to, or interference with (either intentionally or unintentionally), our rights, property, customers, Site users, or anyone else that could be harmed by such activities. We may also access, use, preserve, and/or disclose your Personal Information to law enforcement authorities, government officials, and/or third parties, if legally required to do so, or if we have a good faith belief that such access, use, preservation, or disclosure is reasonably necessary to: (a) comply with a legal process or request; (b) enforce our Terms and Conditions, including investigation of any potential violation thereof; (c) detect, prevent, or otherwise address security, fraud, or technical issues; or (d) protect the rights, property, or safety of Flock, its customers and users, as required or permitted by law.

Policies for Children

The features, programs, promotions, and other aspects of this website requiring Personal Information are not intended for children. Flock does not knowingly collect Personal Information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe they have disclosed Personal Information to us, please notify us at the contact point specified below. A parent or guardian of a child under the age of 13 may review and request deletion of such child’s Personal Information.

Linked Sites

Please be advised that this website may contain links to third party websites. The linked sites are not under the control of Flock, and we are not responsible for the contents or privacy practices of any linked site or any link on a linked site. For specific details on such third parties' privacy practices, please visit their privacy policies.

International Transfers

We are headquartered in the United States, and your personal data is by default, only processed within the U.S. However, in certain circumstances, we may transfer and process your data outside the United States, but only with your explicit consent. If such transfers occur, we will take appropriate measures to ensure your information is protected in accordance with applicable data protection laws, including implementing contractual safeguards or other legal mechanisms as required. You will be informed of the specific details of any international transfer before providing your consent.

U.S. State Privacy Laws

Various U.S. state privacy laws, including but not limited to the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA"), the Virginia Consumer Data Protection Act ("VCDPA"), the Colorado Privacy Act ("CPA"), the Connecticut Data Privacy Act ("CTDPA"), and the Utah Consumer Privacy Act ("UCPA"), require businesses to disclose how they collect, use, and share Personal Information.

Flock is committed to compliance with applicable state privacy laws and does not sell Personal Information. However, we may share Personal Information with third-party advertisers for targeted advertising purposes, and we may allow third parties to collect Personal Information from Flock Services when authorized service providers have agreed to contractual limitations regarding retention, use, and disclosure of such Personal Information. Additionally, if you use Flock Services to interact with third parties or direct us to disclose your Personal Information, we may process your data accordingly.

Your Rights

If you are a resident of a state with privacy laws granting consumer data rights, you may have the ability to:

- Request access to and obtain a copy of your Personal Information;
- Correct inaccurate or incomplete Personal Information;
- Request deletion or cessation of processing of your Personal Information when it is no longer necessary for processing purposes;

- Object to the processing of your Personal Information where Flock relies on its legitimate interests as the legal basis for processing; and
- Withdraw your consent if consent is the legal basis for processing.

To exercise these rights, please make a request by selecting the “Your Privacy Choices” link at the bottom of this Privacy Notice.

Dispute Resolution

If a privacy complaint or dispute relating to Personal Data received by Flock in reliance on the Data Privacy Framework (or any of its predecessors) cannot be resolved through our internal processes, we have agreed to participate in the [VeraSafe Data Privacy Framework Dispute Resolution Procedure](#). Subject to the terms of the VeraSafe Data Privacy Framework Dispute Resolution Procedure, VeraSafe will provide appropriate recourse free of charge to you. To file a complaint with VeraSafe and participate in the VeraSafe Data Privacy Framework Dispute Resolution Procedure, please submit the required information here: <https://www.verasafe.com/privacy-services/dispute-resolution/submit-dispute/>

Binding Arbitration

If your dispute or complaint related to your Personal Data that we received in reliance on the Data Privacy Framework cannot be resolved by us, nor through the dispute resolution mechanism mentioned above, you may have the right to require that we enter into binding arbitration with you under the Data Privacy Framework “Recourse, Enforcement and Liability” Principle and Annex I of the Data Privacy Framework.

Security

Flock has established commercially reasonable policies and procedures, including administrative, technical, and physical safeguards, to protect the confidentiality, integrity, and security of your Personal Information. Flock will take appropriate steps to ensure compliance across Flock’s employees, contractors, agents, and affiliates to prevent any unauthorized access, use, modification, disclosure, or other misuse of your Personal Information.

Flock deploys safeguards for passwords and multi-factor authentication on your account for your privacy and security. You are responsible for protecting your account and Personal Information by choosing a strong password, keeping it secure, and limiting access to your computer, device, and browser. Be sure to sign out when you have finished using your account to help prevent unauthorized access. Unauthorized entry or use, hardware, or software failure, and other factors, may compromise the security of user information at any

time. 100% complete security does not presently exist anywhere online or offline. To that end, please safeguard your credentials.

We take the security of your Personal Information seriously and implement measures designed to protect it. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security. By using Flock Services, you acknowledge these risks. To the extent permitted by law, Flock is not responsible for any security breach unless caused by our gross negligence.