



NETRIX, LLC
PRIVACY NOTICE AND POLICY

This Privacy Notice and Policy is effective as of October 25, 2019. This Privacy Notice and Policy will regularly be updated, with an updated effective date, to reflect any changes in applicable laws or any changes in the way we handle personal data. You will be notified of any changes via email or via the posting of an updated version on our website. We recommend that you regularly check for changes and that you review this Privacy Notice and Policy when visiting our website. If you do not agree with any aspect of the update, we recommend that you notify us promptly and cease using our services.

Your privacy is important to us. Netrix, LLC is a leading technology solutions provider and technology consulting company headquartered in the United States, with affiliated companies in India, the Netherlands, and Bulgaria. This Privacy Notice and Policy ("Policy") explains how Netrix, LLC and its subsidiaries, affiliates and divisions, which include TetraVX and N+2, LLC, (collectively, "Netrix," "we" and "our") manages the personal data we obtain:

- From our clients, vendors and business partners;
- From or about individuals in the course of providing services to our clients or operating our business generally; and
- From operating our websites, collaboration sites, blogs, and other digital media.

The Policy also explains the rights and choices you have in relation to our management of your personal data.

A. INFORMATION COLLECTED

We collect information directly from you which you provide on Netrix websites, collaboration sites, blogs and other digital media (collectively "Sites"), over the phone, pursuant to our customer, vendor and channel partner intake processes, or in any other way. For example, we may collect your name, work title, email address, postal address, phone number, demographics, payment information, user ID, password, and other information you may provide on our sites, such as when you complete a transaction, register for an account, log in to our sites, subscribe to or request our services, participate in an event, contest or survey, or contact our customer service representatives. We may also obtain information about you indirectly from other sources and combine that with information we collect directly from you.

In addition, when you visit our Sites, some information about your visit is automatically collected, such as your device's operating system, application software, Internet Protocol (IP) address, access times, browser type and language, peripherals, user log data, Active Directory information, and the Sites you visited before and after our website. We also collect (directly or via third parties) information about your usage and activity on our websites, including information about your orders, purchases, and cart activity through essential and non-essential cookies, Web beacons, and similar tracking technologies.

B. COOKIES AND SIMILAR TECHNOLOGIES

We also use cookies and similar technologies on our Sites. Cookies are small text files placed on your computer hard drive. Cookies may include information such as the number of times you access the Sites or view a particular page or other item on a Site. This allows us to analyze traffic to our Sites and thereby improve our Sites and your experience by seeing which areas and features are popular and understand usage and to measure the efficacy of our marketing and awareness campaigns.



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By continuing to use our Sites, you consent, where such consent is necessary and valid under applicable law, to our use of cookies and the placement of these cookies on your device for the purposes described.

Many Web browsers are set to accept Cookies by default, and only you have the ability to manage your browser settings. The “help” section of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive new cookies, and how to disable or delete cookies altogether.

C. USE OF INFORMATION WE COLLECT

We may use information collected for purposes described in this Policy or as otherwise disclosed to you on our Sites or in connection with our services. For example, where permitted under applicable law, we may use information that you provide or about you:

- to provide and deliver products and services you request;
- to facilitate the provision of software updates, product support, and other services;
- to administer your account with us;
- to send you transaction information, including confirmations, invoices, technical notices, product and services information, updates, security alerts, and support and administrative messages;
- to respond to your comments and questions and provide customer service;
- to operate and improve our Sites, products, and services;
- to comply with a legal obligation;
- to carry out business intake procedures;
- to market our products and services;
- to establish, exercise or defend legal claims;
- if you have already made the information public and it is readily available; or
- if you have given your explicit consent.

We will decline to use your personal data for the foregoing purposes if your interests and fundamental rights outweigh our legitimate business interests. You have the right to ask us not to process your personal data for marketing purposes. If you refuse to provide information to us or if you request that we stop processing information about you, we may not be able to provide the same level of service to you.

Netrix may store and process your information in the United States and other countries that may not have the same level of protection as your jurisdiction, including allowing access by Netrix staff and the third parties identified below. We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Policy and applicable law, including with respect to transfers from the EU. As permitted by applicable law, you may request details about the suitable safeguards we have in place by contacting us as detailed below.



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D. SENSITIVE PERSONAL DATA

Netrix does not generally collect sensitive data (also known as special categories) through our Sites or otherwise. The term "sensitive data" refers to certain categories of personal data identified by data privacy laws as requiring special treatment, and include racial or ethnic origin, political opinions, religious, philosophical or other similar beliefs, membership of a trade union, physical or mental health, biometric or genetic data, sexual life or orientation, or criminal convictions and offences. In the limited instances when such data may be collected (such as providing particular services to a client), it is done in accordance with data privacy law requirements and/or with your consent.

E. SECURITY OF YOUR INFORMATION

We take reasonable technical, physical, and administrative steps to help protect the personal data we collect, transmit, process and store. We have protocols, controls and relevant policies, procedures and guidance to maintain these arrangements taking into account the risks associated with the categories of personal data and the processing we undertake.

F. RETENTION OF YOUR INFORMATION

Subject to Section I below, we will retain your personal data only for as long as is necessary. We maintain specific records management and retention policies and procedures, so that personal data are deleted after a reasonable time according to the following retention criteria:

- We retain your data as long as we have an ongoing relationship with you (in particular, if you have an account with us).
- We will only keep the data while your account is active or for as long as needed to provide services to you.
- We retain your data for as long as needed in order to comply with our global legal and contractual obligations.

G. TRANSFERRING YOUR INFORMATION

As Netrix continues to develop its business, it might sell or buy other companies or assets or be acquired or have substantially all of its assets acquired by a third party. In such transactions, customer information generally is one of the transferred business assets. You hereby consent to the transfer of your information as one of the transferred assets and to be used for any purpose allowed under this Policy.

H. SHARING YOUR INFORMATION

Ways we may share your information with third parties as follows:

- ***Third Party Vendors/Service Providers.*** We may rely on third-party vendors, consultants and other service providers to perform functions on our behalf and under our instructions in order to make our Sites available to you. For example, we may engage vendors/service providers for auditing, compliance, and corporate governance functions
- ***Netrix Suppliers and Distributors.*** We may share your information with suppliers and distributors to Netrix for their internal purposes including administrative purposes, as well as to improve performance, products and services; and for purposes relating to proposed or completed transactions facilitated by Netrix;



- **Business Partners.** We may share your information with third parties with whom we do business, including to facilitate your purchase of a product manufactured by a Netrix partner, or for their own marketing purposes in compliance with applicable laws and subject to their separate privacy policies;
- **Legal Obligations and Rights.** In connection with: (i) the establishment, exercise, or defense of legal claims; (ii) to comply with laws or to respond to lawful requests and legal process; (iii) to protect the rights and property of Netrix, our agents, customers, and others, including to enforce our agreements, policies, and terms of use; (iv) to detect, suppress, or prevent fraud; (v) to reduce credit risk and collect debts owed to Netrix; (vi) an emergency to protect the personal safety of Netrix, its customers, or any person; or (vii) as otherwise permitted by applicable law.
- **Business Reorganization.** In connection with or during negotiation of any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- **Consent.** We may share your information for any other purposes with your explicit consent.

We may also share aggregated or anonymized information in a form that does not identify you.

I. YOUR RIGHTS AND CHOICES

Email and Marketing Choices. You may ask us not to process your personal data for marketing purposes. In some jurisdictions, you also have the right to opt-out of the disclosure of your personal data to third parties for the third parties' direct marketing purposes. You can exercise your right to prevent such processing by: (i) following the opt-out instructions in promotional emails; (ii) checking certain boxes on the forms we use to collect personal data; or (iii) contacting us directly at Privacy@netrixllc.com. You may also make requests about your contact preferences and changes to your information by using the foregoing email or by contacting your account manager. If you opt-out of promotional emails, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations. In addition, if explicit consent is the basis for processing your personal data, such consent may be withdrawn at any time by providing notice to Privacy@netrixllc.com.

EU/EEA Data Subjects. Pursuant to the General Data Protection Regulation (GDPR), data subjects in the European Union or European Economic Area (collectively, "EU data subjects") may exercise certain rights to access their personal data, subject to certain limitations, by contacting us as detailed above. EU data subjects have the right to exercise certain choices regarding the use of their personal data for marketing purposes, as detailed above and in our Cookie Policy. These rights include the right to rectification and erasure, restriction of data processing, and the right to data portability. If an EU data subject considers that the processing of personal data relating to him or her infringes the GDPR, EU data subjects may also (a) invoke binding arbitration when other dispute resolution procedures have been exhausted and (b) without prejudice to any other administrative or judicial remedy, lodge a complaint with a supervisory authority in the Member State of the data subject's habitual residence, place of work or place of the alleged infringement.

Any transfers of personal data of EU data subjects to third parties located outside the EU/EEA will be based on an adequacy decision of the European Commission or are governed by the standard contractual clauses unless we provide notification to the contrary. Any other non-EU related transfers of your personal data will take place in accordance with the appropriate international data transfer mechanisms and standards. Netrix may be required to disclose personal data of EU data subjects in response to lawful requests by public authorities, including in order to satisfy national security or law enforcement requirements.



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California Privacy Rights. If you are a California resident, you may have the right to request information from us about how we may share certain information about you with third parties for their own direct marketing purposes. Please see the your rights and choices section above for details on the choices you may have regarding such sharing of your information.

J. THIRD-PARTY WEBSITES

Except for Netrix's own online activities on third-party websites and online services where we post our Policy, this Policy does not apply to, and Netrix is not responsible for, any other data practices of third-party websites and online services or the practices of other third parties. To learn about third-party data practices, please review their respective privacy policies.

K. INQUIRIES

If you wish to request information regarding the use or disclosure of your information by Netrix, or if you have any questions about this Policy, please send an email to Privacy@netrixllc.com.