Vbrick Privacy Policy

Information Collection

Vbrick collects information, including Personal Data, defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household that is processed for or on behalf of Vbrick, as it performs its services on your behalf.

Through the Site, we collect (1) an Internet protocol address (IP address); (2) information collected by cookies and similar technologies; and (3) any other personal data provided by you when you visit our Site. See the Digital Advertising & Analytics section of this privacy notice to learn more about the use of this information and the choices available to you. If you register on our Site, we collect any personal data you submit through registration including your name, email address, phone number, and company affiliation. By registering on our Site, the IP address, date, and time of the registration are also collected.

If you contact Vbrick through the Site or through other forms of communication such as email, we collect the personal data you submit. If you apply for employment with Vbrick, we collect the personal data you submit during the application process.

During offline interactions with Vbrick employees, we collect any personal data you provide, such as your name, contact information, business information, and any other personal information you provide, including through the provision of identification cards such as business cards.

The provision of personal data is sometimes required by law, for example in the case of tax regulations, and at other times is a result of a contractual requirement. You may be required to provide personal data, for example in a case where Vbrick signs a contract with you, and the non-provision of personal data could, in certain circumstances, prevent a transaction from concluding.

Information Use

We use Personal Data as necessary for the performance of our Site and services, to meet legal and contractual obligations, and to improve our services (including for example, to understand how our services are used, to learn how best to dedicate resources more efficiently, to provide effective customer service, and to best protect your use of our Site and services.

Vbrick does not sell your Personal Data for the intents and purposes of the California Consumer Privacy Act (CCPA) and certifies that it will not use, or otherwise disclose, the Personal Data for any purpose other than for the specific purpose of performing the services you purchased from us, or as otherwise required by law.

Specifically, we use your personal data for the following purposes:

If you visit our login page, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

- To deliver the content of our Site, including to optimize the content of our Site as well as its advertisements, and recognize Site visitors;
- To deliver products and services you request;
- To respond to your inquiries, or contact you as you request;
- To advertise and market our products and services;
- To explore entering into business transactions or finalizing business transactions;
- To process employment applications;
- To ensure the long-term viability of our information technology systems and website technology;
- To prevent the misuse of our services, and, if necessary, to make it possible to investigate potential offenses, including to provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack;
- As required by Vbrick to enable our business, including for analytics purposes;
- For Vbrick's internal business purposes;
- To protect the security of our interests, including our premises, assets, and systems;
- To comply with the law; and/or as otherwise disclosed at the time personal data is collected.

We do not use automatic decision-making or engage in profiling.

Where we intend to process your personal data for a purpose other than the purpose for which it was collected, we will provide you with information regarding the purpose for the processing, as well as other relevant information, prior to processing your personal data for the new purpose.

Information Sharing

We share your personal data with third parties, including the following:

- With other companies affiliated with Vbrick for purposes related to Vbrick's business;
- With third parties performing services for the benefit of Vbrick, such as email service providers and data storage providers working for Vbrick; and
- As required by law.

We may share information that has been anonymized or aggregated without limitation.

Digital Advertising & Analytics

We may partner with ad networks and other ad serving providers ("Advertising Providers") that serve ads on behalf of us and others on non-affiliated platforms. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information Advertising Providers collect about your use of the Site and other sites or apps over time, including information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising.

Vbrick adheres to the Digital Advertising Alliance ("DAA") Self-Regulatory Principles in connection with this interest-based advertising activity. You may visit the DAA Webchoices tool at www.aboutads.info to learn more about this type of advertising and how to opt out of this advertising on websites by companies participating in the DAA self-regulatory program. If you delete your cookies or use a different browser or mobile device, you may need to renew your opt-out choices exercised through the DAA Webchoices tool. Note that electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests. Additionally, your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, our Site may not function as intended.

For more on how Vbrick uses cookies, see <u>here</u>.

We may also work with third parties that collect data about your use of the Site and other sites or apps over time for non-advertising purposes. Vbrick uses Google Analytics and other third-party services to improve the performance of the Site and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Site, visit https://www.google.com/policies/privacy/partners/, and to opt out of Google Analytics, visit https://tools.google.com/dlpage/gaoptout/.

International Visitors

This section applies to residents of the European Union that visit our Site or interact with us offline.

Lawful Basis for Processing

On certain occasions, we process your personal data when it is necessary for the performance of a contract to which you are a party, such as to supply goods or provide services to you. We may also process your personal data to respond to your inquiries concerning our products and services.

On other occasions, we process your personal data where required by law, such as for the fulfillment of tax obligations. We may also process your personal data if necessary to protect your interests or the interests of a third party.

Additionally, we process your personal data when necessary to do so for direct marketing purposes, such as for company newsletters, monthly product releases, maintenance updates and press releases, but to the most minimal extent necessary to honor your data protection rights. Where we process your personal data for this purpose, our legitimate interest is to carry out our business in favor of the well-being of all our employees and the shareholders.

If the processing of personal data is necessary and there is no statutory basis for such processing, we will generally obtain consent from you. You have the right to withdraw your consent to processing of personal data at any time.

If you wish to exercise the right to withdraw consent, contact our Data Protection Officer or any Vbrick employee.

Transfers of Personal Data

We transfer personal data to the United States and participate in the EU - U.S. Privacy Shield. You can review a copy of Vbrick's Privacy Shield self-certification at privacyshield.gov.

Your Rights

You have a right to the following:

- To request access to the personal data we hold about you;
- To request that we rectify or erase your personal data;
- To request that we restrict or block the processing of your personal data;
- Under certain circumstances, to receive personal data about you that we store and transmit to another without hindrance from us, including requesting that we provide your personal data directly to another, i.e., a right to data portability; and
- Where we previously obtained your consent, to withdraw consent processing your personal data.

All requests will be dealt with at the earliest opportunity. There are exceptions to these rights, however. For example, access to personal data may be denied in some circumstances if making the information available would reveal personal information about another person or if Vbrick is legally prevented from disclosing such information. In addition, Vbrick may be able to retain data even if you withdraw your consent where Vbrick can demonstrate that it has a legal requirement to process your data.

To exercise these rights, contact our Data Protection Officer. See the "Contact" section below.

Additionally, you have the right to lodge a complaint against us. To do so, contact the supervisory authority in your country of residence.

Third Party Links and Tools

The Site may provide links to third-party websites or apps, including news and other content aggregation services. We do not control the privacy practices of those websites or apps, and they are not covered by this privacy notice. You should review the privacy notices of other websites or apps that you use to learn about their data practices.

The Site may also include integrated social media tools or "plug-ins," such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the Site, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public. Your interactions with third-party companies and your use of their features are governed by the privacy notices of the companies

that provide those features. We encourage you to carefully read the privacy notices of any accounts you create and use.

Security

Vbrick has implemented technical and organizational measures to ensure commercially reasonable protection of personal data. However, Internet-based data transmissions may in principle have security gaps, so absolute protection is not guaranteed.

Retention

We will process and store your personal data only for the period necessary to achieve the purpose of the storage, or as permitted by law. The criteria used to determine the period of storage of personal data is the respective statutory retention period or the data retention terms of your agreement with us. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract. If you would otherwise like your persona data purged from our systems, please contact privacy@Vbrick.com.

Your Choices

To change your contact information or communication preferences, please contact us through the methods provided in the "Contact" section below.

Changes

If we decide to change our privacy notice, we will post these changes on this page. We encourage you to visit this page periodically to learn of updates.

Contact

If you have questions, comments, or concerns about this privacy notice, please contact us, in our role as data controller, at privacy@Vbrick.com.

Vbrick Systems, Inc. 607 Herndon Parkway Suite 300 Herndon, VA 20170 USA privacy@Vbrick.com.

Last Updated January 2020