

GARDANT PRIVACY STATEMENT

I. Purpose

GARDANT TECHNOLOGIES, GARDANT GLOBAL and our subsidiaries and affiliates ("GARDANT" or "we") respect the privacy of users and are committed to protecting it through compliance with this Privacy Statement and applicable law. This Privacy Statement covers the Personal Data collection, use, and disclosure practices of GARDANT websites, products, and services that link to this Privacy Statement. "Personal Data" is information that identifies an individual or relates to an identifiable individual. Additional information on our Personal Data processing may be provided in notices at time of data collection.

II. Scope

This Privacy Statement does not cover data from which individual persons cannot be identified, or situations in which pseudonyms are used (the use of pseudonyms involves the replacement of names or other identifiers with substitutes, so that identification of individual persons is not possible).

GARDANT does not knowingly collect Personal Data from children under the age of 13 (or as defined by local law) and does not target its websites, products, and services at children under those ages.

III. Collection and Use of Personal Data

GARDANT may receive Personal Data: (1) directly from you, (2) from an affiliated company, or (3) through information that GARDANT collects from third parties and as you navigate through a GARDANT website or service, including usage details, IP addresses, and cookies. More information about GARDANT's use of cookies may be found in GARDANT's Cookie Policy.

GARDANT uses your Personal Data for business purposes, including without limitation: (1) creating an account; (2) order and service fulfillment; (3) customer service; (4) product improvement; (5) storing and processing data, including Personal Data, in computer databases and servers; (6) implementing and maintaining GARDANT's information technology; (7) personalizing your experience; (8) marketing communications with you including communications from partners for which you have expressed interest; and (9) for other business-related purposes permitted and/or required under applicable local law and regulation. If GARDANT intends to use your Personal Data for any purpose not described in this Privacy Statement, GARDANT will seek your prior consent.

IV. Disclosures/Onward Transfers of Personal Data

GARDANT discloses your Personal Data to those who reasonably need to know such data for a legitimate business purpose and as required by law to GARDANT subsidiaries, third parties, and business partners. By using GARDANT websites, products, and solutions, or by providing your Personal Data to GARDANT, you consent to the potential

transfer, processing, and storage of such information outside of your country of residence where data protection standards may be different than your own.

GARDANT requires our business partners, service vendors, authorized agents, and contractors to whom such disclosures are made to abide by confidentiality obligations. Absent your consent, GARDANT will disclose your Personal Data only to service providers and their contractors who perform tasks on GARDANT's behalf, provided that such service providers and/or contractors either: (a) comply with the EU-US Privacy Shield principles regarding the collection, use, sharing, and retention of personal information from the European Union or use another mechanism permitted by EU data protection laws and the applicable laws of other countries that impose international data transfer restrictions; or (b) agree to provide adequate protections for your privacy interests that are no less protective than those set out in this Privacy Statement and to use the Personal Data only for the purposes for which the third party has been engaged by GARDANT.

GARDANT's business partners are independent third parties that are otherwise not affiliated with GARDANT. Any relationship a customer elects to enter into with a partner for products and services is between the customer and partner directly.

GARDANT will not sell or rent your Personal Data to anyone except as described above. Other than the disclosures described above, GARDANT will disclose Personal Data only when required to do so by law or when GARDANT believes in good faith that disclosure is reasonably necessary to protect the property or rights of GARDANT, third parties, or the public at large. If you are a registered user of a GARDANT website or service and have supplied your email address, GARDANT may, where permitted by law, occasionally contact you via email in order to discuss features, solicit your feedback, or update you on developments regarding GARDANT and its products and services. If you send GARDANT a request (e.g., via a support message or via one of our other feedback mechanisms), GARDANT reserves the right to publish the request in order to help GARDANT clarify or respond to your request or to help GARDANT support other users. GARDANT may disclose to third parties certain aggregated information collected about you and other users, but such information will not contain any personally identifiable information and your identity will remain anonymous.

Irrespective of which country you live in, you authorize GARDANT to transfer, store, and use your information in the United States and any other country where we operate. In some of these countries, the privacy and data protection law and rules regarding when government authorities may access data may vary from those in the country where you live.

V. Sensitive Data

"Sensitive Data" is data that pertains to a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, income records, health, sexual orientation, or alleged commission of any offense. GARDANT does not solicit Sensitive Data and, except as required by law, will not disclose Sensitive Data to any third party. Further, GARDANT will not use your Sensitive Data for any purpose other than (1) for the purpose for which you originally provided it, (2) for a purpose you

later expressly consented to, or (3) where necessary to fulfill GARDANT's legal obligations.

VI. Confidentiality and Security of Data

GARDANT maintains reasonable physical, administrative, and technical safeguards designed to secure your Personal Data and Sensitive Data and prevent unauthorized access to such information. For more information about how GARDANT protects your Personal Data and Sensitive Data, please contact us at privacy@GARDANT.com.

VII. Right to Access, Change or Delete Data

Upon reasonable request and to the extent the request does not compromise the protections set forth in this Privacy Statement, GARDANT permits reasonable access to Personal Data and Sensitive Data in order to correct, amend, or delete such data. You should direct any such request to marketing@gardantglobal.com.

GARDANT will endeavor to respond in a timely manner to all reasonable written requests to view, modify, or delete Personal Data or Sensitive Data.

VIII. Use of Cookies

GARDANT uses cookies (small text files placed on your device) and similar technologies to enhance our websites and online services and help collect data. A cookie will typically contain the name of the domain from which the cookie originated, the "lifetime" of the cookie, and a value, usually a randomly generated unique number. This permits GARDANT to provide you with a better experience when you browse our websites and also allows us to improve our sites and services. GARDANT uses cookies and similar technologies for several purposes, depending on the product, including:

- Where they are essential to operate our websites;
- To enable personalization features on our websites (which give you the ability to recall recently viewed pages and see information which you have input on line);
- To compile anonymous, aggregated statistics that allow us to understand how users use our websites and to help us improve the structure of our websites; and
- To better send you personalized offers.

For more detailed information about cookies, how they are used on our websites, and how to turn off our cookies, please see our Cookie Policy.

IX. Enabling or Disabling Cookies

Most web browsers automatically accept cookies, but provide controls that allow you to block or delete them. You have the ability to accept or decline cookies from our websites at any time by modifying the settings in your web browser. Certain features of GARDANT products depend on cookies. Please be aware that if you choose to block cookies, you may not be able to sign in or use those features, and preferences that are dependent on cookies may be lost. For further information about disabling cookies, please see our Cookie Policy.

X. Data Integrity

You are responsible for the accuracy of the data that you provide to GARDANT. GARDANT will use reasonable efforts to maintain the accuracy and integrity of such data and update it as appropriate. GARDANT will not maintain data any longer than necessary for the purposes stated unless you otherwise agree and as legally required.

XI. Changes to this Privacy Statement

This Privacy Statement is current as of the effective date set forth below. GARDANT reserves the right to change this Privacy Statement from time to time, consistent with applicable data protection and privacy laws and principles. Unless such changes afford greater protections to your privacy interests, or you otherwise consent, such changes will apply only to Personal Data received after the effective date of such change. You should refer to this Privacy Statement regularly, as it will be updated from time to time. By continuing to access or use GARDANT services after such revisions become effective, you agree to be bound by the revised Privacy Statement.

XII. Questions or Complaints

Thoughts or questions about this Privacy Policy? Please let us know by contacting us at officemanager@gardantglobal.com or writing to us at the address below:

GARDANT
Attn: Privacy Statement Inquiry
433 Plaza Real
Suite 275
Boca Raton, FL 33432

XIII. Enforcement

As part of GARDANT's privacy compliance process, GARDANT will review its compliance with this Privacy Statement. If you have any questions, complaints, or disputes regarding the manner in which GARDANT handles or protects your data, please bring it to the attention of GARDANT.

Updated: July 1, 2017