

Introduction

We respect your privacy and are committed to protecting it. This Privacy Statement (“Statement”) provides an overview of how AFIMAC, via our websites, products and services, handle privacy, and how we protect your Personal Data.

This Privacy Statement applies to the AFIMAC websites, products and services that link to or reference this Statement and describes how we handle Personal Data and the choices available to you regarding collection, process, access, and how to update, correct and delete your Personal Data.

If you are in the European Economic Area, and unless stipulated otherwise contractually, the Controller of your Personal Data is AFIMAC which has its principal place of business at 15830 Foltz Pkway, Strongsville, OH 44149.

What This Statement Covers

This Statement describes the following details of our collection and processing of Personal Data concerning you.

- Personal data AFIMAC collects;
- How personal data is processed;
- The transfer of data to third parties;
- The accuracy, integrity and security of your Personal Data;
- The retention and destruction of your Personal Data;
- Rights available to you as it pertains to your Personal Data;
- The Personal Data of children under 13 years of age; and
- Contact info if you have any questions regarding the use of your Personal Data.

Personal Data We Collect

We may collect data or ask you to provide certain data about you, including Personal Data, when you use our websites, products and services and interact with us, for the purpose of helping us manage our relationship with you. “Personal Data” is any information that relates to an identified or identifiable individual, and may include name, address, email address, phone number, login (account number, password), marketing preferences, date of birth, or payment card number. We may also collect Personal Data from trusted third-party sources and engage third-parties to collect Personal Data to assist us. This data may include:

- Contact details, such as name, mailing address, email address and phone number;
- Address and billing data, including credit card and payment data;
- Your account history with us;
- Data you provide to us to receive technical and/or customer assistance interactions;
- Details of your visits to our Site including, but not limited to, traffic data, location data, weblogs, and other communication data, and the resources that you access.

When you choose to provide us with Personal Data about third-parties, this data will only be used for the specific reason for which you elect to provide it. It is your responsibility to ensure that when you disclose to AFIMAC Personal Data of individuals other than yourself – such as your contacts, your users or other third-parties – you abide by applicable privacy and data security laws, including informing users and third-parties that you are providing their Personal Data to AFIMAC, informing them of how it will be transferred, used, or processed, securing appropriate legal permissions and safeguards required for such disclosures, transfers and processing. If you choose to provide AFIMAC with a third-party's Personal Data (such as name, email, and phone number), you represent that you have the third-party's permission to do so. Examples include members traveling with your party or individuals that require medical or protection services. You also acknowledge that when we interact with such third-party individuals whose Personal Data you share with us, it is our duty to inform them that we obtained their Personal Data from you. Where applicable, third-parties may unsubscribe from any future communication using the below e-mail address. If you believe that one of your contacts has provided us with your Personal Data and you would like to request that it be removed from our database, please contact us at privacy@afimacglobal.com.

How We Process Your Personal Data

We use your Personal Data for the purposes described below:

On the basis of providing services to you or entering into a contract with you at your request, in order to:

- Create and manage your AFIMAC account, when you purchase services from us and when needed to access communications and services;
- Verify your identity and entitlement to products or services, when you contact us or access our services;
- Process your purchase transactions;
- Update you on the status of your orders;
- Manage your subscriptions; and
- Provide you with technical and customer support.

On the basis of your consent, in order to:

- Subscribe you to a newsletter, send product updates or technical alerts;
- Send you marketing communications and information on new products, services and assets;
- Communicate with you about, and manage your participation in contests, offers or promotions;
- Solicit your opinion or feedback, provide opportunities for you to test software;

On the basis of legal obligations, we are obligated to, for instance, keep records for tax purposes or answer compelling orders and provide information to public authorities.

On the basis of our legitimate interest in the effective delivery of services and communications to you as well as to our other customers and partners, in order to:

- Communicate commercial promotions and provide quotes for our products and services;
- Research and implement product improvements and product updates;
- Evaluate and improve the performance and quality of our products, services and websites;
- Provide you with a customized experience when you visit our websites;
- Allow interoperability within our applications;
- Secure our systems and applications;
- Allow for the provisioning of services;
- Enforce our legal rights; and

We will only process any special categories of Personal Data (“Sensitive Personal Data”) relating to you for specific purposes outlined above or because either: 1. You have given us your explicit consent to process that data; or 2. The processing is necessary for the establishment, exercise or defense of legal claims; or 3. You have made the data public.

On the basis of our legitimate interest, we and our third-party partners, may combine the data we collect from you over time from our websites, products and services with data obtained from other sources. We combine your data with other sources to improve user experience on our websites and services we provide. In some instances, AFIMAC and the third-parties we engage may automatically collect data through cookies, web logs and other similar applications. This data is used to better understand and improve the usability, performance, and effectiveness of our websites, products and services to help tailor content or offers for you. Please reference the "Tracking Technologies, Cookies & Do-Not-Track" section below for more information.

Marketing and Community Networking

AFIMAC has a legitimate interest in promoting our commercial offerings and to optimize the delivery of communications to that effect to our customers and audiences that are most likely to find them relevant. We will therefore collect and process data to that end as explained below. However, where we are legally required to obtain your consent to provide you with certain marketing materials, we will only provide you with such marketing materials where we have obtained such consent from you. If you do not want to continue receiving any marketing materials from us, you can contact privacy@afimacglobal.com.

Messages

In addition to the purposes described above, we may, in compliance with applicable legal requirements, use your Personal Data to provide you with advertisements, promotions and information about products and services tailored to you and your needs. Contact details, including phone numbers, mail and email addresses, may be used to contact you. If you do not want us to use your Personal Data in this way, you can simply choose not to consent to such use of your data on the webpages and/or forms through which such Personal Data is collected. You can also exercise this right at any time by contacting us as explained below.

Data from Third-Parties

Third-parties may provide us with Personal Data they have collected about you from you or from further online and offline sources, such as marketing data from our partners and third-parties that is combined with information we already have about you, to provide you with more relevant

communications and better tailored offers. We make reasonable efforts to verify that the third-parties we engage for such purposes are reputable and law-abiding and we will not solicit them to disclose to us Personal Data we do not have a lawful purpose to collect and process. However, we are not liable for any processing of your Personal Data by such third-parties prior to, during or after them providing it to us. We may combine such Personal Data with the Personal Data we already have about you to provide you with a better experience, evaluate your interest in our products or improve the quality of our offerings.

Tracking Technologies, Cookies & Do-Not-Track

Cookies

A cookie is a commonly used automated data collection tool. Cookies are small text files that are placed on your computer or device by websites that you visit or HTML-formatted emails you open, to make websites work, or work more efficiently. We and our partners may use cookies, web beacons, pixel tags, scripts or other similar technologies on our websites or emails to:

- Ensure the proper functioning of our websites and the proper delivery of legitimate electronic communications;
- Tailor information presented to you based on your browsing preferences, such as language and geographical region;
- Collect statistics regarding your website usage;
- Provide us with business and marketing information; and
- In some cases, to enable a third-party to deliver future advertising for our products and services to you when you visit certain websites owned by third-parties.

We use different kinds of cookies:

- **Essential cookies** are necessary to provide you with services and features available through our websites. Without these cookies, services you may need, such as shopping carts or e-billing, cannot be provided.
- **Analytics or customization cookies** collect data that is either used in aggregate form to help us understand how the website is being used or how effective our marketing campaigns are, or to help us customize the website for you.

If you do not wish to receive cookies you may be able to refuse them by not agreeing to the use of them upon entering the website. If you do so, we may be unable to offer you some of our functionalities, services or support. If you have previously visited our websites, you may also have to delete any existing cookies from your browser.

We gather certain data automatically and store it in log files. This data may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. We may combine this log data with other data we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

We use local storage, such as HTML5, to store content data and preferences. Third-parties with whom we partner to provide certain features on our website or to display advertising based upon

your web browsing activity also use HTML5 to collect and store data. Various browsers may offer their own management tools for removing HTML5 content.

Do-Not-Track

There are different ways you can prevent tracking of your online activity. One of them is setting a preference in your browser that alerts websites you visit that you do not want them to collect certain data about you. This is referred to as a Do-Not-Track (“DNT”) signal. Please note that our websites may not recognize or act in response to DNT signals from web browsers. There is currently no universally-accepted standard for what a company should do when a DNT signal is detected. In the event a final standard is established, we will assess how to appropriately respond to these signals. For more detailed information about cookies, Do-Not-Track and other tracking technologies, please visit www.allaboutcookies.org and <https://allaboutdnt.com>.

Third-Party Data Collection

Cookies may also be placed by third-parties to deliver tailored information and content which may be of interest to you, such as promotions or offerings, when you visit third-party websites after you have left our websites. We do not permit these third-parties to collect Personal Data about you beyond such cookies (e.g., email address) on our site.

Social Media Features and Widgets

Our websites include social media features, such as Facebook’s “Like” button. These features are usually recognizable by their third-party brand or logo and may collect your IP address, which page you are visiting on our websites, and set a cookie to enable the feature to work properly. Social media features and widgets are either hosted by a third-party or hosted directly on our site. Your interactions with any such third-party feature is governed by the privacy policy of the company providing it.

How We Disclose Your Personal Data

We do not sell, lease, rent or give away your Personal Data. We only disclose your Personal Data as described below, within AFIMAC, with our partners, with service providers that process data on our behalf and with public authorities, as required by applicable law. Processing is only undertaken for the purposes described in this Statement. If we disclose your Personal Data, we require its recipients to comply with adequate privacy and confidentiality requirements, and security standards.

Partners

We may provide your Personal Data to our partners for the purpose of allowing them to conduct AFIMAC business. Our partners go through our third-party risk management and assessment process and only after that are they authorized to promote and sell our products and services. Our partners may use your Personal Data to communicate with you and others about AFIMAC products or services. If you do not wish to receive promotional emails from our partners, you can unsubscribe by contacting privacy@afimacglobal.com.

Service Providers Processing Data on Our Behalf

We may use contractors and service providers to process your Personal Data on our behalf for the purposes described in this Statement and the relevant product and service privacy notices accessible below. We contractually require service providers to keep data secure and confidential

and we do not allow our data processors to disclose your Personal Data to others without our authorization, or to use it for their own purposes. However, if you have an independent relationship with these service providers their privacy statements will apply to such relationships. Such service providers may include in particular contact centers, payment card processors and marketing/survey/analytics suppliers.

Public Authorities

In certain instances, it may be necessary for AFIMAC to disclose your Personal Data to public authorities or as otherwise required by applicable law. No Personal Data will be disclosed to any public authority except in response to:

- A subpoena, warrant or other process issued by a court or other public authority of competent jurisdiction;
- A legal process having the same consequence as a court-issued request for data, in that if AFIMAC were to refuse to provide such data, it would be in breach of local law, and it or its officers, executives or employees would be subject to liability for failing to honor such legal process;
- Where such disclosure is necessary for AFIMAC to enforce its legal rights pursuant to applicable law;
- A request for data with the purpose of identifying and/or preventing credit card fraud; or
- Where such disclosure of Personal Data is necessary to prevent or lessen a serious and imminent threat of bodily or other significant harm to the data subject or other individuals potentially concerned.

Cross-Border Transfers of Personal Data among AFIMAC Entities and to Third-Party Vendors

We are a global company and, as such, we process data in many countries. To conduct our business, and in accordance with this Statement, your Personal Data may be transferred to AFIMAC in the United States, and to subsidiaries and third-party vendors of AFIMAC located worldwide. All transfers will occur in compliance with data transfer requirements of applicable laws and regulations. Where Personal Data originating from the European Economic Area is transferred to AFIMAC entities or to third-party vendors engaged by AFIMAC to process such Personal Data on our behalf who are located in countries that are not recognized by the European Commission as offering an adequate level of Personal Data protection, such transfers are covered by alternate appropriate safeguards, specifically standard data protection clauses adopted by the European Commission.

In the process of continuing to develop our business, we may also occasionally acquire subsidiaries or other business entities. As a result of such transactions, and for maintaining a continued relationship with you, we may transfer your Personal Data to a related affiliate.

If we are involved in a reorganization, merger, acquisition or sale of our assets, your Personal Data may be transferred as part of that transaction. We will notify you of any such deal and outline your choices in that event.

How We Protect Your Personal Data

Safeguards

We take reasonable and appropriate administrative, technical, organizational, and physical security and risk management measures in accordance with applicable laws to ensure that your Personal Data is adequately protected against accidental or unlawful destruction, damage, loss or alteration, unauthorized or unlawful access, disclosure or misuse, and all other unlawful forms of processing of your Personal Data in our possession.

Securing Personal Data is an important aspect of protecting privacy. Our organization applies policies, standards and supporting security controls at the level appropriate to the risk level and the services provided. In addition, appropriate security controls are communicated to application owners and technology teams across the business to support secure development of products and a secure operating environment.

We pay specific attention to the protection of Personal Data and the risks associated with processing this data.

These measures include:

Physical Safeguards

We lock doors and file cabinets, control access to our facilities, implement a clean desk policy, and apply secure destruction to media containing your Personal Data.

Technology Safeguards

We use network and information security technologies such as anti-virus and endpoint protection software, encryption, intrusion detection and data loss prevention, and we monitor our systems and data centers to ensure that they comply with our security policies. For example confidential information such as credit card data is transmitted using Transport Layer Security (“TLS”) encryption.

Organizational Safeguards

We conduct regular company-wide, as well as role-specific and targeted training and awareness programs on security and privacy, to make sure that our employees and contractors understand the importance of protecting your Personal Data, and that they learn and maintain the necessary knowledge and skills effectively to protect it in practice. Our organizational privacy policy and standards also guide our handling of your Personal Data.

Personal Data Breaches

AFIMAC takes every reasonable measure to prevent Personal Data breaches. When these do occur, we have a process in place to take swift action within our responsibilities. These actions will be consistent with the role we have in relation to the products, services or processes affected by the breach. In all cases, we will work together with affected parties to minimize effects, to make all notifications and disclosures that are required by applicable law or otherwise warranted, and to take action to prevent future breaches. We systematically outline responsibilities in case of Personal Data breaches in our contracts, both with customers as well as with our vendors.

Storage of Your Personal Data

The data we collect from you may be stored, with risk-appropriate technical and organizational security measures applied to it, on in-house as well as third-party servers in the United States, in Canada, as well as anywhere AFIMAC or our vendors operate.

Links to Other Websites

Our websites may contain links to other websites, which are owned or operated by other companies. If you choose to visit any linked websites, we encourage you to review their privacy statements carefully, as they may differ from ours. We are not responsible for the content or privacy practices of websites that are owned by companies that are not within AFIMAC. Our websites may also link to co-branded websites that are maintained by AFIMAC and one or more of our business partners, who are collecting your Personal Data pursuant to their own privacy practices. We encourage you to read the privacy statements on any co-branded site to which you link for information on the privacy practices of that site.

Children's Privacy

Our websites are not directed to, nor do we knowingly collect data from, children under 13 years of age, except where designed specifically to assist you by providing travel assistance and/or security services. In such cases, we will only collect and process Personal Data related to any child under 13 years of age which you choose to disclose to us or otherwise instruct us to collect and process.

Managing Your Personal Data

How long we retain or store your Personal Data

We will hold your Personal Data on our systems for the longest of the following periods: 1. As long as necessary to maintain our ongoing business relationship, or as needed to provide you with the products, services or information which you are entitled to or can otherwise reasonably expect to receive from us; 2. For as long as necessary for the purpose for which we collected it or for which you supplied it to us in accordance with any product or service relevant activity or process; 3. Any retention period that is necessary to comply with our legal obligations, to resolve disputes, to enforce our agreements; or 4. The end of the period in which litigation or investigations might arise in respect of our business relations or other interactions with you.

For the sake of clarity where AFIMAC is a data controller processing your Personal Data for our own purposes, your Personal Data will be deleted or de-identified when it is no longer needed for its originally stated processing purposes, or any additional compatible purpose for which AFIMAC may lawfully further process such data.

Moreover, where AFIMAC is a data processor processing your Personal Data for the purposes and on the instructions of another data controller or data processor, we will comply with the time limits agreed with that other Controller or Processor unless we are compelled by applicable laws and regulations to delete such data sooner, or to retain it further.

Your Privacy Rights

Pursuant to the Privacy Shield Principles, the EU GDPR, and other applicable privacy laws, you have the right to:

- Know what Personal Information AFIMAC has about you;
- Ensure your Personal Information is accurate and relevant for the purposes for which AFIMAC collected it;
- Make your Personal Information portable to another data controller;
- Withdraw your consent to AFIMAC processing your Personal Information; and
- Have your Personal Information erased.

If you would like to review, correct, receive a copy of, or erase the Personal Information we have about you or withdraw your processing consent, please send us your request to privacy@afimacglobal.com. Unless a legal exemption applies, we will respond to all such requests within thirty (30) days. If we refuse your request, we will notify you of our reasons for the refusal to the extent required and how you may complain about the refusal.

We ask individual users to identify themselves and to specify the information requested to be accessed, corrected, or erased before processing such requests, and we may decline to process requests that are unreasonably repetitive and vexatious, require disproportionate technical effort (for instance, requests concerning information residing on backup tapes), jeopardize the privacy of others, or would be extremely impractical, or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. However, we will not charge you for the making of the request or to correct, update, or erase your Personal Information.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://www.jamsadr.com/file-an-eu-us-privacy-shield-or-safe-harbor-claim>.

If you are a California resident under the age of 18, you may be permitted to request the removal of certain content that you have posted on our websites. To make such a request, please contact us at privacy@afimacglobal.com.

Contact Us

If you have any questions or concerns regarding the way in which your personal data is being processed or you want to exercise your rights above, please reach out to AFIMAC using the contact information below:

AFIMAC data privacy officer, who serves as AFIMAC's data protection contact, and can be contacted at privacy@afimacglobal.com.

Changes to this Statement

We reserve the right to revise or modify this Statement. In addition, we may update this Privacy Statement to reflect changes to our data practices. If we make any material changes we will

notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.