

VIVOTEK PRIVACY POLICY

[VIVOTEK] (the “Company”, “we”, “us”)

Protecting the personal privacy of every customer, vendor and employee is a crucial part of our continuous endeavor in winning and securing the trust from our stakeholders. The privacy policy outlined below serves as an indication of our commitment to protecting the security and privacy of your personal data.

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be achieved by the data alone or in conjunction with any other data in the data controller’s possession or likely to come into such possession. The processing of your personal data is governed by the applicable data protection regulations, e.g., General Data Protection Regulation 2016/679 (the “GDPR”).

What roles do we play in processing your data?

We are the data controller with respect to processing your data. This means that we decide how your personal data is processed and for what purposes. We know that you care how your personal data are used and shared, and we appreciate your trust on us that we will do so carefully and sensibly.

When is your personal data collected?

Your personal data can be collected by us:

- whenever you become our supplier, customer or employee;
- whenever you register to use our online services (each time you log in or use them);
- whenever you fill in forms and contracts that we send to you;
- whenever you use our services and products;
- whenever you subscribe to our newsletters or reply to our invitations (conferences, etc.);
- whenever you contact us via the various channels we offer you;

What personal data do we collect about you?

The personal data we collect include any and all data you provide to us when you enter into a contract or register an account with us, log on our website, provide us information on a web form, and update or add information to your account. You can choose not to provide data to us, but we may then not be able to service you where such services require processing such data. We use your personal data for purposes such as communicating with you, responding to your requests, enhancing your experience with us, and improving our products and services.

Examples of the data we collect and store include: your e-mail address, name, postal address, phone number, login name, account number, password, any financial data (e.g., bank accounts and credit card numbers) and logistics data (e.g., customs ID and tracking number) you provide during a transaction, and your chat and service history with us.

We also receive and store certain types of data whenever you interact with us. For example, we use "cookies," which are unique identifiers that we transfer to your device for recognizing your device by our systems. When your web browser accesses our web pages, advertisements and other websites

on our behalf, we gather certain types of data, such as Internet protocol (IP) address, device ID or token, unique identifier, device type, referral URL, computer and connection data such as browser type and version, your browsing history and your web log information.

You may refuse the use of cookies by selecting the appropriate settings on your browser. Visit www.allaboutcookies.org for details on how to delete or reject cookies. Please note that, however, this may make you unable to use the full functionality of our web services.

We may also collect data about your location and your mobile device when you download our apps. We may use this data to provide you with location-based services, such as advertisements, search results and other personalized contents. You can turn off location services on your device anytime at your own will.

Use of Google Analytics

Our website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help analyze how visitors use the website. The information generated by the cookie will be transmitted to and stored by Google on servers in the United States. Google Analytics offers website owners IP-anonymization option, which, once activated, will truncate your IP-address before transmitting the information. Only in exceptional cases the whole IP-address will be first transferred to a Google server in the USA and truncated there. The IP-anonymization feature of our website has been activated. Google will use the IP-anonymized information on our behalf for evaluating your use of the website, compiling reports on website activity, and providing us other services relating to website activity and internet usage. The IP-address that your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by making appropriate settings on your browser, however, with the potential loss of partial functionality of our website services. You can also opt-out from being tracked by Google Analytics by downloading and installing: <https://tools.google.com/dlpage/gaoptout?hl=en>.

How do we process your personal data?

We comply with the requirements of the applicable data protection regulations by keeping your personal data up to date, by storing and destroying it securely, by collecting and retaining only that necessary to service you, by protecting it from loss, misuse, unauthorized access and disclosure, and by ensuring that appropriate technical measures are in place to protect your personal data.

The processing operations we perform on your data may cover automated and non-automated means of collecting, recording, organizing, structuring, storing, altering, retrieving, using, transmitting, disseminating, aligning or combining, restricting and/or erasing your data.

We use your personal data for the following purposes:

- To deliver services to you under our contract with you.
- To operate our website to provide you access to and use of our services.
- To comply with our obligations under applicable laws regarding processing employment and social security data of employees.
- To customize, measure and improve our services - based on your preferences.
- To provide other services requested by you as described when we collect the information.
- To contact you for conducting research about your opinions of current services and products or of potential new services and products that may be offered by us.
- To inform you of our news, events and activities.
- To deliver targeted marketing, service updates and promotional offers.

- To share your contact details with our affiliate offices around the world within our group companies for the purposes of internal administration and back-office support.
- To maintain the integrity and safety of our data technology systems which store and process your personal data.
- To share your contact details with our logistics partners so that they can deliver our products to you.
- To provide you with location based services (such as advertisements and other personalized contents).
- To enforce or defend our policies or contract with you.
- To detect and investigate data breaches, illegal activities and fraud.

What is our lawful basis for processing your personal data?

We only store and process your personal data if you provide your explicit consent beforehand, e.g., when establishing contact or obtaining information. This allows you to decide whether you wish to transfer your personal data when registering or responding to a survey. If you agree, we can use your data to respond to inquiries or to improve our services and products. We will collect, process and use the personal data supplied explicitly by you only for the purposes communicated to you as above. We will not disclose it to third parties without your permission unless the following situations mandate the disclosure:

- To negotiate and perform a contract with you.
- To comply with a government agency or court order.
- To establish or preserve a legal claim or defense.
- To prevent misuse or other illegal activities, such as willful attacks on our systems, for maintaining data security.
- To serve additional purpose that is directly related to the original purpose for which the personal data is collected.

We further detail the circumstances of data disclosure to third parties in the section “Sharing your personal data” below.

Necessity to provide us your personal data

You are not under any obligation to provide us your personal data. As noted below, the choice is completely yours. However, please note that without certain data from you, we may not be able to undertake some or all of our obligations to you, or adequately provide you with our full range of services.

Sharing your personal data

Your personal data will be treated strictly confidential, and will be shared only with the categories of data recipients listed below. We will not share your data with third parties outside our group companies without your consent. When you are consulted, you will have an opportunity to reject.

We may disclose your personal data to:

- our affiliated entities within our group of companies worldwide to provide you services such as facilitating order processing and shipping, serving internal administration purposes, detecting and dealing with data breaches, illegal activities and fraud, and maintaining the integrity of our information technology systems.

- third party service providers whom we subcontract to provide you with our services, such as logistics, marketing, payment processing and invoice collection, and information systems technical support. The subcontracted service may also include detecting and dealing with data breaches, illegal activities and fraud.
- governments, courts or law enforcement agencies to comply with our obligations under relevant laws and regulations, to enforce or defend our policies or contract with you, to respond to claims, or in response to a verified request relating to a government or criminal investigation or suspected fraud or illegal activity that may expose us, you, or any other of our customers to legal liability. If any law enforcement agency requests your data, we will attempt to redirect the law enforcement agency to request that data directly from you, and in such event, we may provide your basic contact information to the law enforcement agency.
- third parties involved in a legal proceeding, if they provide us with a court order or substantially similar legal procedure requiring us to do so.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for the given purpose for which your data is collected. If you provide, or have provided, consent for us to process your data, we will keep your data for no longer than your consent is effective.

Notwithstanding the above, we may retain your personal data, as required by the applicable laws and regulations, to assist any government and judicial investigations, to initiate or defend legal claims, or to serve the purpose of civil, criminal or administrative proceedings. If none of the above grounds applies, we will delete and dispose of your data in a secure manner in accordance with our privacy policy.

Privacy of data subjects under the age of 16

Our products and services are not targeted to persons under the age of 16. We do not knowingly collect or process personal data from persons under the age of 16.

Your rights over your personal data

Unless subject to an exemption under the applicable data protection regulations, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request to erase your personal data where it is no longer necessary for us to retain such data;
- The right to withdraw your consent to the processing of your data at any time;
- The right to request that we provide you with your data and, where possible, transmit that data directly to another data controller;
- The right, where there is a dispute in relation to the accuracy or the lawfulness of our processing of your personal data, to request that a restriction is placed on further processing of your data;
- The right to object to us using your personal data to engage in direct marketing;
- The right to lodge a complaint regarding our processing of your data with the competent authority where you reside in or where your data is processed.

After receiving your request, we will evaluate your request and inform you how we intend to proceed on your request. Under certain circumstances as stipulated in the applicable data protection regulations, we may withhold access to your data, or decline to modify, erase, port, or restrict the processing of your data.

Transfer of your personal data abroad

As a company of global presence, we must be able to transmit your data to other countries within our worldwide group companies for the reasons set forth above. In making such international data transfers, we will ensure the protection of your personal data by applying the level of security required by the applicable data protection regulations.

Further processing

Before we use your personal data for a new purpose not covered by this data privacy policy, we will provide you with a new notice explaining this new use prior to commencing such further processing. In such case, we will find a lawful basis for the further processing and, whenever necessary, we will seek your prior consent to such further processing.

Security

We protect your data using technical measures to minimize the risks of misuse, unauthorized access or disclosure, and loss of access. Examples of the safeguards we use are data pseudonymization, data encryption, firewalls, and data access authorization controls. The security mechanisms used to protect your data are checked and updated regularly to provide effective protection against abuse.

If you believe that the security of your data has been compromised, or if you like more information on the measures we use to protect your data, please contact us.

Whom should you contact?

If you have any question about this privacy policy, or intend to exercise any of your rights (including withdrawing your prior consent) and/or discuss a complaint with us, please email us at privacy@vivotek.com