IronEdge Group - Privacy Policy

Effective Date: October 20, 2023

By using, browsing and/or accessing our website, you agree to the terms of this Privacy Policy. Your visit to the website and any dispute over privacy is subject to our <u>Terms of Use</u> and the laws of the state of Texas. Use of this website is strictly voluntary. If you do not agree to this Privacy Policy, you are advised to not access our website.

This Privacy Policy describes the types of personal information we obtain, how we may use that personal information, with whom we may share it and how you may exercise your rights under United States and European laws (collectively referred to as "Data Protection Laws" herein) regarding our processing of that information. The Privacy Policy also describes the measures we take to safeguard the personal information we obtain and how you can contact us about our privacy practices.

Download a copy of this Privacy Policy (PDF)

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Sources of Personal Information

- When you browse the IronEdge Group website;
- When you fill out any forms (e.g, sales forms for products or a support ticket request) on the IronEdge Group website;
- When you create an online customer account;
- When you interact with an online chat function on the IronEdge Group website ;and
- Cookies and other technologies.

Cookie Policy

- <u>Background:</u> IronEdge Group uses cookies, web beacons (including pixels and tags), and similar technologies on our website which may read or write information on your device in order to collect certain information about you by automated means. A "cookie" is a text file that websites send to a visitor's computer or other Internet-connected device to uniquely identify the visitor's browser or to store information or settings in the browser. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.
- <u>Purpose</u>: We use these automated technologies to collect information about your equipment, browsing actions, and usage patterns. The personal information we obtain in this manner includes IP address and other identifiers associated with your devices including Apple Advertising Identifier or Android Advertising ID, device characteristics (such as operating system), language preferences, referring/exit pages, navigation paths, access times, browser preferences and characteristics, installed plugins, local time zones, local storage preferences, clickstream data, and other information about your online activities.

Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our website. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device.

The length of time a cookie will stay on your browsing device depends on whether it is a "persistent" or "session" cookies. Session cookies are automatically deleted when you close your browser. Persistent cookies remain on your computer or other Internet-connected device after you end your browsing session, unless you choose to delete them.

- Specific Cookies We Use: Cookies used by IronEdge Group include:
 - (1) Essential cookies
 - (2) Functional cookies;
 - (3) Analytics/Performance cookies; and
 - (4) Targeting/Advertising cookies.
- (1) <u>Essential Cookies</u>: These cookies are operational and necessary for us to provide our products and services on our website and typically may not be disabled. You may set your browser to block or alert you about these cookies, but parts of our website may

not function properly. Essential cookies authenticate you to our website, identify you after you log in, and increase the security of our products.

- (2) <u>Functional Cookies:</u> These cookies enable our website to provide enhanced functionality and personalization. Functional cookies may be set by us or by third party providers whose services we add to our website. Functional cookies remember your language preference and geolocation data when visiting our website and provide enhanced, personal features.
- (3) <u>Analytics/Performance Cookies:</u> These cookies collect information on how users navigate and use our website, such as the pages they view, how long they stay on a page and whether the page is displayed correctly or whether errors occur. Analytics cookies improve the performance of our website.
 - a. <u>Google Analytics.</u> We use cookies provided by third-party analytics providers, including Google Analytics, for aggregated, anonymized website traffic analysis. In order to track your session usage, Google drops a cookie (_ga) with a randomly-generated ClientID in your browser. This ID is anonymized and contains no identifiable information like email, phone number, name, etc. We also send Google your IP Address. We use GA to track aggregated website behavior, such as what pages you looked at, for how long, and so on. This information is important for improving the user experience and determining site effectiveness.
- (4) <u>Targeting/Advertising Cookies:</u> These cookies deliver advertisements relevant to your interests and may be set by either us (first party cookies) or our third party partners including social media cookies. Advertising cookies limit the number of times you see an advertisement and help measure the effectiveness of an advertising campaign. Third party cookies recognize your browser when you visit our website and may use information from your visit in order to place advertisements for our products on other websites you visit. We do not control the types of information collected and stored by these third-party cookies. You should check the third-party's website for more information on how they use cookies.
- <u>Do Not Track Signals</u>: Certain web browsers allow you to instruct your browser to send Do Not Track ("DNT") signals to websites you visit, informing those sites that you do not want your online activities to be tracked. Our website is not designed to respond to "do not track" signals received from web browsers. However, with most web browsers, you can take steps to limit tracking by erasing cookies from your device and by setting your browser to block all cookies or warn you before a cookie is stored.

Personal Information We Collect

- Contact information (such as name email address, telephone number, postal or other physical address) for you or for others (e.g., principals in your business or billing contacts);
- Information used to create your online account (such as username and password);
- Billing and financial information (such as name, billing address, payment card details and bank account information and purchase history); and
- IP address and geolocation data (such as data derived from your IP address, country and zip code).

How We Use Personal Information Collected

- Provide and administer IronEdge Group products and services (including websites and apps for which you have registered);
- Process and fulfill orders in connection with IronEdge Group products and services and keep you informed about the status of your order;
- Help you complete a transaction or order and provide customer support;
- Bill you for products and services purchased;
- Operate, evaluate and improve our business (such as by administering, developing, enhancing and improving IronEdge Group products and services; managing our communications and customer relationships; and performing accounting, auditing, billing, reconciliation and collection activities);
- Perform data analytics (such as research, trend analysis, financial analysis and customer segmentation);
- Communicate with you about your account and orders (including sending emails relating to your registration, account status, order confirmations, renewal or expiration notices and other important information);
- Conduct advertising, marketing and sales activities (including sending you promotional materials, generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing the IronEdge Group brand);
- Communicate with you about, and administer your participation in, events, programs, promotions and surveys; and
- Comply with and enforce relevant industry standards, contractual obligations and IronEdge Group policies.

Our Purpose and Legal Basis for Collection

- Performance of a contract with you or a relevant party;
- Our legitimate business interests;
- Compliance with a legal obligation, a court order, or to exercise or defend legal claims; or
- Your consent to the processing, which you can revoke at any time; and

 We may combine personal information collected from you with other sources to help us improve the accuracy of our marketing and communications as well as to help expand or tailor our interactions with you. This includes combining personal information we obtain through our website with other channels. We may anonymize or aggregate personal information and use it for the purposes identified in this section and for other purposes to the extent permitted by applicable law.

When We Share Personal Information with Third Parties

- If sharing your personal information is necessary to provide a product, service or information you have requested;
- To keep you up to date on the latest product announcements, software updates, special offers or other information we think you would like to hear from our business partners;
- With service providers we have engaged to perform services on our behalf (such as payment processing, order fulfillment, customer support, customer relations management and data analytics). These service providers are contractually required to safeguard the information provided to them and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements;
- If we are required to share your personal information under applicable law, regulation or legal process (such as a court order or subpoena) or with law enforcement authorities or other government officials to comply with a legitimate legal request (e.g., an investigation of suspected or actual fraud, illegal activity or in response to a security issue);
- If we believe disclosure is necessary to prevent physical harm or financial loss to IronEdge Group or the public as required or permitted by law or in order to establish, exercise or defend our legal rights; and
- In the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) or other business transaction.
- IronEdge Group does not sell personal information as the term sell is commonly understood. Under certain Data Protection Laws, a "sale" is defined to include disclosures of personal information to a third party for monetary or valuable consideration. When you use the IronEdge Group website, our third party authorized partners, such as data analytics providers and social networks, may collect cookies and similar technology and use this data (such as your Internet or other similar network activity) for their own purposes, such as improving their own services. This activity may qualify as a "sale" under applicable Data Protection Laws. You can make choices to allow or prevent such uses clicking on the Cookie Preferences link on the bottom of the page.

Social Media and Other Third Party Links

Our websites may, from time to time, contain links to and from: (1) social media platforms and (2) third party websites. When you use social media links, we may collect additional information

from or about you, such as your screen names, profile picture, contact information, contact list, and the profile pictures of your contacts. Please be advised that social media platforms and third party websites may also collect information from you. We do not have control over nor are we responsible for the collection, use, and sharing practices of social media platforms and third party websites. We recommend you carefully review their privacy policies before you provide personal information on a social media platform or third party website.

[As applicable: We use third party partners to supply and support our online chat or chatbot function, which we use to handle customer inquiries in real time. If you use our online chat function, we may record and collect the contents of your online chat session which will be retained for X (number) years, unless otherwise stated, and will not be shared other than to extent required by law. The third party partner providing the chatbot may collect information from your session in order to track use of the services.

Nothing we communicate in the online chat will be considered a legal agreement, representation, or warranty as to our services, decisions, or response times. You may not use the online chat to send any abusive, defamatory, dishonest, or obscene message, and doing so may result in termination of your online chat session. You may request a transcript of the recording of your online chat session by contacting us at: legal@ironedgegroup.com

How We Secure Personal Information

While IronEdge Group strives to protect your information, IronEdge Group cannot ensure or warrant the security of any information you transmit to or from our website, by e-mail or otherwise, and you provide such information at your own risk. IronEdge Group cannot guarantee against any loss, misuse, unauthorized disclosure, alteration or destruction of data or personal information.

You acknowledge that: (1) there are security and privacy limitations in computer systems and on the Internet which are beyond IronEdge Group' control; (2) the security, integrity, and privacy of any and all information and data exchanged between you and IronEdge Group through our website cannot be guaranteed; and (3) any such information and data may be viewed or tampered with by a third party while such information or data is being used, transmitted, processed, or stored.

Notice to California Residents

The California Privacy Rights Act ("CPRA") grants residents of California certain rights with respect to their personal information as described in this section.

• <u>Right to Transparency</u>: At the time we collect personal information, you have the right to receive notice of the categories of personal information we collect, and the purposes for which those categories of personal information will be used.

- <u>Right to Access/Right to Know</u>: You have the right to request access to personal information we collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties including service providers with whom we share it.
- <u>Right to Deletion:</u> You have the right to request that we erase data we have collected from you. Please note that we may have a reason to deny your deletion request or delete data in a more limited way than you anticipated (e.g., because of a legal obligation to retain it or to provide a good or service that you request)
- <u>Right to Request Correction</u>: You have a right to request correction of inaccurate personal information.
- <u>Right to Opt-Out of Sale and Share:</u> You have the right to request that we stop "selling" your personal information as that that term is defined in the California Privacy Rights Act. A "sale" of personal information is defined broadly: "selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, an individual's personal information by the business to another business or a third party for monetary or other valuable consideration." "Sharing" of personal information is defined as: "sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, an individual's personal information by the business to another business to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration, including transactions between a business and a third party for cross-context behavioral advertising for the benefit of a business in which no money is exchanged."
- <u>Right to Non-Discrimination:</u> You have the right to not be discriminated against for exercising any of your privacy rights. The right is violated if you are: denied any of our goods or services, charged different prices for goods or services, provided different levels of quality for goods or services, or if we suggest that you will be charged different prices for goods or services or provided different levels of quality for goods or services. Please note your exercise of these rights may limit our ability to process personal information (e.g., in the case of a deletion or a do not sell request) and we may no longer be able to provide you with our products and services or otherwise engage with you in the same manner.
- <u>Right under Shine the Light Law:</u> Subject to certain limitations, you may ask us to
 provide a list of the types of personal information that we disclose to third parties for
 their direct marketing purposes, and the identities and physical address of such third
 parties.

• <u>Categories of Personal Information We Collect:</u> We collect the categories of information described in the table below.

CATEGORY OF PERSONAL INFORMATION (AS SPECIFIED IN THE CPRA)	PERSONAL INFORMATION COLLECTED
Identifiers	 Data such as your name, postal address, unique personal identifier, online identifier, IP address, email address, account name and other similar identifiers.
Categories of Personal Information Described in Cal. Civ. Code § 1798.80(e) (the California Customer Records Statute)	 Data such as your name, signature, address, phone number, bank account number, credit card number, debit card number, or any other financial information.
Characteristics of Protected Classifications	• Data such as demographic information.
Commercial Information	 Data such as records of products or services purchased, obtained, or considered and other purchasing or consuming histories or tendencies.
Internet or Other Electronic Network Activity Information	 Data such as your browsing history, search history and information regarding your interaction with websites, applications or advertisements.
Geolocation Data	 Data such as the location of your device (e.g., based on a browser or device's IP address or Bluetooth technology, if your device settings allow for this).
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	 Data such as your image and video footage captured by call and video recordings.

• <u>Categories of Personal Information We Disclose</u>: We may disclose any of the categories of information listed above and use them for the purposes listed below.

BUSINESS PURPOSES (AS SPECIFIED IN	CATEGORIES OF PERSONAL INFORMATION
THE CCPA)	
Performing services, including	 Identifiers
maintaining or servicing accounts,	 Categories of Personal Information Described
providing customer service,	in Cal. Civ. Code § 1798.80(e)

processing or fulfilling orders and transactions and verifying customer information, processing payments, providing advertising or marketing services, providing analytics services or providing similar services.	 Characteristics of Protected Classifications Commercial Information Internet or Other Electronic Network Activity Information Geolocation Data Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information Identifiers
Short-term, transient use, including, but not limited to, the contextual customization of ads shown as part of the same interaction.	 Identifiers Commercial Information Internet or Other Electronic Network Activity Information Geolocation Data
Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity and prosecuting those responsible for that activity.	 Identifiers Categories of Personal Information Described in Cal. Civ. Code § 1798.80(e) Characteristics of Protected Classifications Commercial Information Internet or Other Electronic Network Activity Information Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information
Debugging to identify and repair errors that impair existing intended functionality.	 Identifiers Commercial Information Internet or Other Electronic Network Activity Information
Undertaking internal research for technological development and demonstration.	 Identifiers Characteristics of Protected Classifications Commercial Information Internet or Other Electronic Network Activity Information
Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.	 Identifiers Categories of Personal Information Described in Cal. Civ. Code § 1798.80(e) Characteristics of Protected Classifications Commercial Information Internet or Other Electronic Network Activity Information Geolocation Data Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information

- <u>Categories of personal information we "sell"</u>: We may "sell" any of the categories of personal information listed above to third parties.
- How to Exercise Your Privacy Rights:
 - To exercise your CPRA privacy rights, please email us at legal@ironedgegroup.com with the subject line "CPRA Request."
 - To exercise your California Shine the Light Law privacy rights, please email us <u>legal@ironedgegroup.com</u> with the subject line "California Shine the Light Request."

Notice to Colorado, Connecticut, Utah, and Virginia Residents

The disclosures in this section apply solely to individual residents of the States of Colorado, Connecticut, and Utah, and the Commonwealth of Virginia. Privacy laws in these states give residents certain rights with respect to their personal information, when they take effect over the course of 2023. These rights include:

- <u>Right to Access Information:</u> You have the right to confirm if IronEdge Group is processing your personal information and to access your personal information.
- <u>Right to Request Deletion:</u> You have the right to request that we delete personal information provided by or obtained about you.
- <u>Right to Correct:</u> You have the right to correct inaccuracies in your personal information.
- <u>Right to Portability</u>: You have the right to obtain a copy of your personal information in a format that is: (i) portable to a technically reasonable extent; (ii)_readily usable to a practical extent; (iii) enables you to transmit the personal information to another entity reasonably easily if the processing is carried out by automated means.
- <u>Right to Opt-Out of Targeted Advertising</u>: You may ask us not to use or disclose your personal information for the purposes of targeting advertising to you.
- <u>Right to Opt-Out of Information Sales:</u> You may ask us not to sell your personal information to third parties.
- <u>Right to Non-Discrimination:</u> You have the right to not be discriminated against for exercising any of your privacy rights. The right is violated if you are: denied any of our goods or services, charged different prices for goods or services, provided different levels of quality for goods or services, or if we suggest that you will be charged different prices for goods or services or provided different levels of quality for goods or services.

Please note your exercise of these rights may limit our ability to process personal information (e.g., in the case of a deletion or a do not sell request) and we may no longer be able to provide you with our products and services or otherwise engage with you in the same manner.

• <u>How to Exercise Your Privacy Rights:</u> To submit a request to exercise your privacy rights, please email us at legal@ironedgegroup.com with the subject line "Privacy Rights Request" and let us know in which state you live.

Notice to European Residents

European Data Protection Laws, including the European Union General Data Protection Regulation ("GDPR"), grant certain rights regarding your personal information. For purposes of these laws, including the IronEdge Group is the "controller" of your personal information. A "controller" is defined as an organization that processes personal data for its own purpose. A "processor" is defined as an organization that processes personal data on behalf of other organizations. We process your personal information only as permitted by law and in accordance with the table below.

PROCESSING PURPOSES	LEGAL BASIS (AS SPECIFIED IN THE GDPR)
Site Operation and Services Delivery	 Processing is necessary to perform the contract governing our provision of our services or to take steps that you request prior to signing up for the Services. If we have not entered into a contract with you, we process your personal information based on our legitimate interest in providing the information and/or services you access and request.
Research and Development; Marketing and Advertising; Customer Experience	 These activities represent legitimate interests. We do not use your personal information for these activities where our interests are overridden by any impact on you (unless we have your consent or are otherwise required or permitted to by law).
Compliance with Applicable Laws	 Processing is necessary to comply with our legal obligations.

If you are a resident of Europe, you may request that we take any of the following actions with respect to your personal information:

- <u>Right to Access</u>: You have the right to request access to personal information we collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties including service providers with whom we share it.
- <u>Right to Request Correction</u>: You have a right to request correction of inaccurate personal information.
- <u>Right to Restrict:</u> You have a right to restrict the processing of your personal information.
- <u>Right to Withdraw:</u> You have right to withdraw your consent to the processing and use of your personal information completely or partially at any time with future application.
- <u>Right to Portability</u>: You have the right to obtain a copy of your personal information in a format that is: (i) portable to a technically reasonable extent; (ii) readily usable to a practical extent; (iii) enables you to transmit the personal information to another entity reasonably easily if the processing is carried out by automated means.
- <u>Right to Complain:</u> You have the right to complain to the responsible supervisory authority if you believe that processing of your personal information is in violation of European Data Protection Laws. Please review "How to Submit a Complain" below.
- <u>How to Exercise Your Privacy Rights:</u> To exercise your privacy rights under European Data Protection Laws, please email us at legal@ironedgegroup.com with the subject line "CPRA Request." You may be subject to a reasonable fee to meet our costs in providing details of personal information we hold about you.
- <u>Automated Decision-Making and Profiling</u>: For purposes of this Privacy Policy, automated decisions are defined as decisions about individuals that are solely based on the automated processing of personal information and that produce legal effects for the individual involved. This means processing using, for example, software code or an algorithm, which does not require human intervention. We do not use automated decision-making. IronEdge Group may use profiling to capture data analytics from aggregated, anonymized website traffic analysis.
- How to Submit a Complaint. You have the right to submit a complaint about how we process your personal information or our response to your requests regarding your personal information. To lodge a complaint, you may contact us at legal@ironedgegroup.com or submit a complaint to the European data protection regulator in your jurisdiction. In the European Economic Area, you can find your data protection regulator <u>here</u>. In the United Kingdom, you can find your data protection regulator <u>here</u>.

Retention of Personal Information

To the extent permitted by applicable law, IronEdge Group typically retains personal information for as long as it is needed: (1) for the purposes for which we obtained it, in accordance with the terms of this Privacy Policy, which means that we will keep your personal information for the duration of our relationship or as long as you keep your account open with us; or (2) to comply with applicable laws, resolve disputes and enforce our agreements.

The CPRA requires that we disclose the criteria used to determine how long we retain personal information. Our records contain several categories of personal information combined together and therefore we consider, on a case-by-case basis, a number of factors to assess how long personal information is retained. These factors include the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we may achieve those purposes through other means, and applicable laws.

We will delete or anonymize your personal information that is no longer required. If deletion is not possible (e.g., when your personal information is stored in our backup archives), we will secure and isolate your personal information from further processing until deletion is possible. We may

Verification Process

Before responding to a request for personal information under applicable Data Protection Laws, IronEdge Group must verify the request. Verification is important to protect your personal information and to help confirm that we are responding to a valid request and providing the response to the correct individual. To verify the request, we initially ask for at least two (2) or three (3) identifiers, such as name, email address and location. If we have a need to request additional identifiers to reasonably verify your identity, we will contact you and request additional verification. The personal information we ask to verify your identity may depend on your relationship with IronEdge Group.

When you exercise your privacy rights under the applicable Data Protection Laws, you can designate an authorized agent or representative to make a request on your behalf by providing the authorized agent with written permission to do so and verifying your identity with us as part of the request, or by providing the authorized agent with Power of Attorney pursuant to applicable law (e.g., the California Probate code). We will ask the individual submitting the request to denote that they are an authorized agent or representative. When submitted by an authorized agent or representative, we ask the authorized agent or representative to provide name, email address and a description of the relationship with the individual who is the subject of the request and to certify that the representative has permission to submit the request and may request proof of the individual's written permission.

Children's Personal Information

The IronEdge Group website, including the products and services advertised thereon, is designed for a general audience and is not directed to children under the age of 13. We do not knowingly collect, solicit, share or sell personal information from children under the age of 13 without parental or guardian consent. If we become aware that we have collected personal information from a child under the age of 13, we will promptly delete the information from our servers. If you believe that a child under the age of 13 may have provided us with personal information, please contact us at: legal@ironedgegroup.com

International Transfers of Personal Information

Please be aware that personal information we collect may be transferred to and maintained on servers or databases located outside your state, province, country, or other jurisdiction, where the privacy laws may not be as protective as those in your location. If you are located outside of the United States, please be advised that we process and store personal information in the United States. We may transfer personal data pursuant to your consent or when it is necessary for the fulfillment of a contract.

Changes to this Privacy Policy

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our information management practices. IronEdge Group will indicate at the top of this Privacy Policy when it was most recently updated. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

How to Contact Us

If you have any questions or comments about this Privacy Policy or if you would like to exercise your privacy rights regarding personal information that IronEdge Group maintains about you or your preferences, please contact us by e-mail or the toll free number below.

- o legal@ironedgegroup.com
- o 713-574-5555