# SPARTRONICS WEBSITE PRIVACY POLICY

This Privacy Policy discloses our policy about the collection, maintenance, use, disclosure, and security of Personal Data obtained by Spartronics on the Spartronics Sites. References to "we", "our", "us", or "Spartronics" in this Privacy Policy mean Spartronics, LLC, a Delaware limited liability company. References to Spartronics Sites mean any webpages operated by Spartronics and branded with the Spartronics name. References to Personal Data mean personal data that is collected in connection with your use of the Spartronics Sites. By using Spartronics Sites, you agree with the collection, use, storage and disclosure of your Personal Data by Spartronics in accordance with this Privacy Policy.

### Personal Data We Collect

Spartronics may collect, store and use various types of Personal Data, such as:

- information about your computer, your visits and use of Spartronics Sites (including IP address or other device identifiers, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths) and more generally information collected through cookies and similar technologies;
- information provided when registering and completing profile details (such as, but not limited to, salutation, first and last name, email address, title or function, phone number, projects and employment or company details, country and other location details, category (e.g. journalist, investor etc. and industry);
- your subscription choices for Spartronics email notifications, alerts and/or newsletters;
- information sent to Spartronics through Spartronics Sites or otherwise (including contact information, the communication content and metadata associated with the communication), e.g. when you contact us using forms on the Spartronics Sites;
- information that you provide via our Careers page to apply for open positions in Spartronics; and
- any other Personal Data communicated by you to Spartronics through the Spartronics Sites.

Such Personal Data may be collected from:

- you directly, when you use Spartronics Sites, sign up for a newsletter, create a profile, or use the Spartronics Sites to contact employees of Spartronics;
- other sources, such as public databases, joint marketing partners, and social media platforms (e.g. for data such as company name, location, job title).

To the extent you submit any Personal Data about other people to Spartronics, you represent that you have the authority to do so and to permit Spartronics to use such third party Personal Data in accordance with this Privacy Policy.

### Our Use of Your Personal Data

Spartronics may use your Personal Data for the following purposes:

- administer and personalize Spartronics Sites and business for you by presenting products, marketing messages, commercial offers, and content tailored to you;
- send you email notifications that you have specifically requested, respond to your inquiries and fulfil your requests, such as to send you technical documents or whitepapers, and to send you commercial communications;
- send you marketing communications relating to Spartronics and selected third party businesses that Spartronics believes may be of interest to you, such as newsletters, in accordance with your communication preferences (you can inform us at any time if you no longer wish to receive newsletter or marketing communications);

- share your Personal Data with other Spartronics affiliates where appropriate to offer you a better service;
- to conduct and determine the effectiveness of promotional campaigns, and to operate and expand Spartronics business activities;
- deal with enquiries, complaints and other submissions made by or about you relating to any Spartronics Sites and Spartronics products or services;
- consider applications for employment made by you through the Spartronics Sites;
- perform data analysis, identify website usage trends, audits, crime/fraud monitoring and prevention, security, improving or modifying Spartronics Sites and diagnose problems with Spartronics Sites;
- associate information you provide us, with other information we collect from you or about you from third parties, for marketing and analytics purposes; and
- check compliance with the terms and conditions governing the use of Spartronics Sites.

### Disclosure of Your Personal Data to Third Parties

Spartronics may share your Personal Data with its subsidiaries and any Spartronics employees, officers, insurers, professional advisers, agents, suppliers or subcontractors around the world for the purposes described in this Privacy Policy. Spartronics may also share your Personal Data with third-party suppliers and service providers worldwide for data processing, storage, and other services such as web site hosting, data analysis, marketing and promotional campaigns, information technology and related infrastructure provision, customer service, email delivery, auditing and other similar services.

Furthermore, Spartronics may share your Personal Data with a third party worldwide in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Spartronics business, assets or stock (including in connection with any bankruptcy or similar proceedings).

Spartronics will also share or release information, including Personal Data, (i) when Spartronics believes release is appropriate or required to comply with the applicable laws and/or to respond to requests from competent public and government authorities including public and government authorities outside your country of residence, (ii) in connection with any ongoing or prospective legal proceedings, (iii) to enforce or apply Spartronics policies or agreements, (iv) to protect the rights, property or safety of Spartronics, Spartronics customers and other users (including for fraud protection and credit risk reduction), or (v) for other lawful purposes.

### Our Use of Cookies & Our Response to Do Not Track Signals

Cookies are pieces of information that some websites transfer to the computer that is browsing that website and are used for record-keeping purposes at many websites. Use of cookies makes web-surfing easier by performing certain functions such as saving passwords and other preferences regarding the use of the particular website. Many consider the use of cookies to be an industry standard. Spartronics uses cookies to provide you with personalized content, to understand how and how often visitors use our website, and for marketing purposes. Browsers are usually set to accept cookies. However, if you would prefer not to receive cookies, you may alter the configuration of your browser to refuse cookies. If you choose to have your browser refuse cookies, it is possible that some areas of our website will not function as intended or at all.

Some web browsers also have an option that allow you to send "Do Not Track" requests to websites. Spartronics Sites do not respond to Do Not Track (DNT) signals.

#### Security of Your Personal Data

The security of the servers and other computer equipment used to store and process your personal data is a high priority of Spartronics. We maintain personal data with technical, administrative, and physical safeguards to protect against loss, unauthorized access, destruction, misuse, modification, and improper disclosure. We follow industry-proven security procedures such as encrypted administrative communication, restricted access to underlying machines, and firewalls at network access points. No computer system or information can ever be fully protected against every possible hazard, but Spartronics is committed to providing reasonable and appropriate security controls to protect your personal data against foreseeable hazards.

### Minors and Children Under the Age of 16

The Spartronics Sites are not directed at, and are not intended for persons under the age of eighteen (18). Spartronics will not knowingly collect data from children without proper parental consent. If you believe that Spartronics may have collected Personal Data from someone under the age of eighteen (18), or under the applicable age of consent in your country, without parental consent, you can contact Spartronics to take appropriate measures to investigate and address the issue promptly. Parents wishing to access, review or delete their child's Personal Data may contact Spartronics by using the contact email address listed in this Privacy Policy.

### Your Rights in Relation to your Personal Data

You may have certain rights related to the personal data we have collected from you, which may or may not be granted based on the circumstances, and only in compliance with applicable law. These rights may include the following:

- You can remove consent, where you have provided it, at any time.
- You can ask us to confirm if we are processing your personal data.
- You can ask for access to your personal data.
- You can ask to correct your personal data if it's wrong.
- You can ask us to delete your personal data.
- You have a right to be forgotten and you can ask that our systems stop using your personal data.
- You can ask us to restrict how we use your personal data.
- You can ask us to help you move your personal data to other companies. You have a right to ask that we provide your personal data in an easily readable format to another company.
- You can ask us to stop using your personal data.
- You have the right to lodge a complaint to the relevant data protection authority.

If you wish to exercise any of the foregoing rights, the request should be sent via email to <u>Info@Spartronics.com</u> which includes, your name, company and corporate email address. The designated individual will review your request and contact you with any issues, such as the information being retained as required by law. Opt out notices are also available on all electronic promotional communication received from our organization or by sending an email to <u>Info@Spartronics.com</u>.

#### Changes to this Privacy Policy

This Privacy Policy supersedes all previous versions.

Spartronics reserves the right to change this Privacy Policy at any time. Any change to this Privacy Policy will become effective when Spartronics makes the revised Privacy Policy available on Spartronics Sites or when Spartronics notifies you of such change.

Contact

You can contact Spartronics regarding this Privacy Policy at the following email address: <u>Info@Spartronics.com</u>. Please provide Spartronics with your contact details, the name of the Spartronics Sites or service in question, and a detailed description of your request.

## Effective Date

This policy was updated on October 1, 2020.