

Logicalis Privacy Shield Privacy Policy

This Privacy Shield Privacy Policy (the 'Policy') applies to all personal information received by Logicalis Inc. in the United States from the European Economic Area (EEA) and from Switzerland, in any format, including electronic, paper or verbal.

Logicalis Inc. complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Logicalis Inc. has certified that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>

Logicalis is subject to the investigatory and enforcement authority of the Federal Trade Commission (FTC).

In compliance with the Privacy Shield Principles, Logicalis Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Logicalis at:

Logicalis Legal Services
Bloomfield Hills
2600 S. Telegraph Road, Suite 200
Bloomfield Hills, MI 48302
ofc: 248-957-5600
Email: LegalServices@us.logicalis.com

Logicalis Inc. has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

If your complaint is not satisfactorily addressed, and your inquiry or complaint involves human resource data transferred from the EU in the context of the employment relationship, you may have your complaint considered by an independent recourse

mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities (“DPA Panel”), and for Swiss Data Subjects, the Swiss Federal Data Protection and Information Commissioner (“FDPIC”). To do so, you should contact the state or national data protection or labor authority in the jurisdiction where you work. Logicalis Inc. agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel and the FDPIC.

Scope

This Logicalis Privacy Policy Statement (the 'Policy') applies to all personal information received by Logicalis in the United States from the EEA and from Switzerland, in any format, including electronic, paper or verbal.

Review Period

The Policy will be reviewed twelve months after the issue date and annually thereafter. The Policy is reviewed at other times as dictated by operational needs. Logicalis will be re-registered annually and pay annual fees to maintain certification.

Definitions Related to Logicalis Privacy Shield Policy

Logicalis refers to Logicalis Inc., Logicalis US, and its successors, subsidiaries, divisions, and groups within the United States.

Agent means any third party who collects or uses personal information under the instructions of, and solely for, Logicalis or to which Logicalis discloses personal information for use on Logicalis' behalf.

Personal Information means information or sets of information which identifies or could be used by or on behalf of Logicalis to identify an individual. Personal information does not include information that is encoded or anonymized, or publicly available that has not been combined with non-public personal information. As the data processor, Logicalis handles types of data at the specific direction of and when authorized by the data controller. Types of data handled by Logicalis at the behest of the data controller is: names, addresses, contact information, and email addresses

Sensitive Personal Information means personal information which reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, views or activities, which concerns health or sex life, information about social security benefits, or information on criminal or administrative proceedings and sanctions other than in the context of pending proceedings. Logicalis treats personal information sensitive if data is received from a third party where that party treats and identifies the information as sensitive. Logicalis Inc. may act as a processor and collect these types of data for the purposes identified within this policy or other full-executed contracts such as standard business clauses.

Privacy Principles

The privacy principles in the Policy have been developed based on the Privacy Shield Principles.

Notice

Notice will be provided in clear and conspicuous language when individuals are first asked to provide personal information to Logicalis, or as soon as practicable thereafter, and in any event before Logicalis uses or discloses the information for a purpose other than that for which it was originally collected.

Choice

For personal information, Logicalis offers individuals the opportunity to make their own decisions regarding:

(a) if their personal information is to be disclosed to a non-agent third party, or

(b) if their personal information is to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual, or
(c) if they wish to exert the right to access their own data to review, collect, or delete it, or
(d) if they wish to indicate specific criteria which limits use and disclosure of their personal data
For sensitive personal information, Logicalis will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

Logicalis will provide individuals with reasonable mechanisms to consummate choices. Requests for nondisclosure, limited purpose use or disclosure, accessing one's own data for review, correction, or editing are be updated by contacting Logicalis Legal services at LegalServices@us.logicalis.com. Logicalis will provide individuals with reasonable mechanisms to consummate choices.

Data Integrity

Logicalis will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. Logicalis will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

Logicalis will only collect and store personal information relevant to fulfill the purpose of the request and will retain such information no longer than appropriate to fulfill the purpose of the request.

Transfer to Agents

Logicalis contractually works with business partners to deliver services to customers. Business partners contractually operate as primary data managers and data controllers, providing services such as Software as a Service (SaaS) and Platform as a Service (PaaS). Logicalis provides Infrastructure as a Service (IaaS) and provides customer services and support. In some cases, these business partners may have access to personal information in order to communicate and provide services to customers. No personal, private, or protected information is permitted to be used by these other companies for their own purposes. Logicalis may be liable for the appropriate transfer of personal data to third parties.

Logicalis may be required to disclose an individual's personal information to comply with a lawful request by public authorities including to meet national security or law enforcement requirements.

Access and Correction

Logicalis Inc. recognizes the individual's right to access their personal information. When requested, Logicalis will grant individuals access to personal information which Logicalis stores about them. Logicalis will take reasonable steps to permit individuals to correct, amend, or delete information demonstrated to be inaccurate or incomplete. Requests can be made by contacting Logicalis Legal services at LegalServices@us.logicalis.com.

Security

Logicalis uses quality physical, electronic, and administrative safeguards to protect personal information from loss; misuse; or unauthorized access, disclosure, alteration, or destruction.

Enforcement

Logicalis will conduct compliance audits of relevant privacy practices to verify adherence to this Policy. Any employee that Logicalis determines intentionally violates this policy will be subject to

disciplinary action up to and including termination of employment. Logicalis is subject to the investigatory and enforcement power of the Federal Trade Commission (FTC).

For organizational human resource data, Logicalis cooperates and complies with the EU Data Protection Authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) to investigate unresolved complaints.

Limitation on Application Principles

Adherence by Logicalis to Privacy Shield Principles may be limited:

(a) to the extent required or permitted by law or legal process, such as to respond to or investigate a legal or ethical obligation or request or pursuant to court orders, subpoenas, interrogatories or similar directive carrying the force of law; and

(b) to the extent expressly permitted by an applicable law, rule or regulation, and

(c) the possibility, under other certain limited conditions, Logicalis Inc. may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Internet Privacy

Logicalis recognizes the Internet and the usage of other technology as valuable tools used to communicate and interact with customers, consumers, employees, healthcare professionals, business partners, business associates, and others. Logicalis recognizes the significance of maintaining the privacy of information collected online and has created an Internet Privacy Policy Statement (the "IPP") governing the treatment of personal information collected through web sites it operates. With respect to personal information that is transferred from the European Economic Area or Switzerland to the U.S., the IPP is subordinate to this Policy. However, the IPP also reflects additional legal requirements and evolving standards with respect to Internet privacy. Logicalis Internet Privacy Policy can be found at <http://www.us.logicalis.com/useful-information/privacy-policy/>.

Complaints

In compliance with the Privacy Shield Principles, Logicalis Inc. commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Logicalis at:

Logicalis Legal Services

Bloomfield Hills

2600 S. Telegraph Road, Suite 200

Bloomfield Hills, MI 48302

ofc: 248-957-5600

Email: LegalServices@us.logicalis.com

Logicalis Inc. has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

If your complaint is not satisfactorily addressed, and your inquiry or complaint involves human resource data transferred from the EU in the context of the employment relationship, you may have your complaint considered by an independent recourse mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities ("DPA Panel"), and for Swiss Data Subjects, the Swiss Federal Data Protection and Information Commissioner ("FDPIC"). To do so, you should contact the state

or national data protection or labor authority in the jurisdiction where you work. Logicalis Inc. agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel and the FDPIC.

Should your complaint remain fully or partially unresolved after a review by Logicalis Inc., BBB EU Privacy Shield and the relevant DPA, you may be able to, under certain conditions, seek arbitration before the Privacy Shield Panel. For more information, please visit www.privacyshield.gov.

Logicalis Privacy Shield Contact Information

All Questions or comments regarding Logicalis Privacy Shield Privacy Policy should be submitted to Logicalis Legal Services Department at the following address:

Logicalis Legal Services Bloomfield Hills, 2600 S. Telegraph Road, Suite 200, Bloomfield Hills, MI 48302, ofc: 248-957-5600, LegalServices@us.logicalis.com

Additional Logicalis Contact Information

Contact Office: Logicalis Legal Department **Primary Contact Name:** Alan Coale **Contact Title:** Director of Information Security and Compliance - Legal Department **Contact Phone:** 513 707 7245

Contact Fax: 513 412 7959

Contact E-mail: Alan.Coale@us.logicalis.com

Contact Office: Logicalis Legal Department

Secondary Contact Name: Chris Banerian

Contact Title: Legal Staff

Contact Phone: 248 957 5651

Contact Fax: 513 412 7959

Contact E-mail: LegalServices@us.logicalis.com

Corporate Officer (i.e., individual certifying your organization 's compliance with the Privacy Shield Framework(s)): Alan Coale **Corporate Officer Name:** Alan Coale **Corporate Officer Title:** Director of Information Security and Compliance **Corporate Officer Phone:** 513 707 7245 **Corporate Officer Fax:** 513 412 7959 **Corporate Officer E-mail:** Alan.Coale@us.logicalis.com

Logicalis Privacy Shield Privacy Policy Review Period

Logicalis Privacy Shield Policy will be reviewed twelve months after the issue date and annually thereafter. The Policy is reviewed at other times as dictated by operational needs. Logicalis must re-register annually and pay annual fees to maintain Logicalis Privacy Shield.

Logicalis meets Privacy Shield Policy requirements by updating, where appropriate, and reaffirming its existing self-certification. Logicalis submission is made on or before the anniversary of the day on which the organization' s original self-certification becomes officially finalized.

Logicalis Privacy Shield Privacy Policy Changes

Requests for changes to Logicalis Privacy Shield Policy are sent to the document Author or Logicalis Legal Department. Requests must provide details of the required changes and the reasons for the changes requested.