

# OcularIT Solutions, Inc Privacy Policy 2021

## 1. About this Privacy Policy

We care about your privacy. This Privacy Policy sets out the basis on which we, OcularIT Solutions, Inc and our affiliates (hereinafter "OcularIT"), take care of your privacy. It explains how we collect, use, process, share, disclose and store your Personal Data -as this term is defined below, collected through your interactions with us; including through our website [www.ocularit.com](http://www.ocularit.com), (hereinafter the "Site"), sale's process, marketing activities, and other means, as further detailed on Section 3.

As used in this Privacy Policy, "Personal Data", "Personal Information" or "information about you" means any data relating to an identified or identifiable individual including but not limited to:

- your name,
- last name,
- company name,
- email address,
- phone number,
- date of birth,
- card type credit or debit,
- card number,
- expiration date,
- postal code,
- details of your purchase and payment history, among others.

The aim of this Privacy Policy is to ensure that you understand the Personal Data we collect from you, the purposes for which we collect it, how we use it, and how we share it. In sum, to explain to you how we protect your privacy, and explain to you your rights in connection to the Personal Data we collect and process about you. For further clarifications on this Privacy Policy, questions, or concerns, please do not hesitate to contact us (see Section 18 How to contact us).

## 2. About OcularIT

OcularIT Solutions, Inc is headquartered in Virginia, USA. For the purpose of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), OcularIT is the data controller of your Personal Data as described in this Privacy Policy, unless expressly specified otherwise. More information about our global locations is available here: <https://www.ocularit.com/contact-us/>.

## 3. Personal Data we collect from you

### When do we collect your Personal Information?

We may collect data, including your Personal Data, through our interactions with you, and when you:

- Register, or complete or submit information or forms on our website;
- Download content on our website;
- Register for webcasts, seminars, conferences, etc. sponsored by us, or a partner;

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- Provide us with feedback and information via phone, email, social media, etc.;
- Answer a survey;
- Subscribe to our newsletters or other content-related material;
- Use Live Chat;
- Use forums or leave comments on our website;
- Purchase or use OcularIT products and/or services;
- During in-person meetings or at OcularIT's events, conferences, workshops or gatherings;

Online information about you may also originate from the use of cookies and similar technologies (for example, pixel tags and device identifiers) on our Site or sites of third parties. For more information on cookies and similar technologies, please see Section 6 below.

Please note that OcularIT does not control the content that you may post to OcularIT's forums or social networks; in some cases, such content may be publicly available on the Internet. You should carefully consider whether you wish to submit Personal Information to these forums or social networks and whether you wish to make your profile available to other users.

### **Categories of Personal Information and Specific Pieces of Personal Information we collect from you.**

We have collected within the last twelve (12) months, and may collect in the future the following categories of Personal Information listed below from consumers, for commercial and/or business purposes:

- Identifiers and registration contact information: such as name, e-mail address, postal address, telephone number, account name, online identifier, Internet Protocol (IP) address, or other similar identifiers.
- Customer records information: such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, bank account number, credit or debit card number, other financial information.
- Characteristics of protected classifications under California or federal law: such as age, gender.
- Commercial information: such as delivery information and records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies and transactions made with us.
- Internet or other electronic network activity information: device information and device identifiers, browsing type and language, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement, and data connection and use, such as information you download.
- Geolocation data: such as city, state, zip code, etc. related to your IP address.
- Inferences on your preferences and characteristics.
- Other information, such as any other information you choose to provide us directly in relation to the use of our services, surveys we send you, etc., customer information such as questions and other messages that you send us directly through online forms, chats, e-mail, phone, or post, summaries or voice recordings of your interactions with customer service.

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Privacy Shield Framework compliance - OcularIT complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. OcularIT has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms 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, please visit <https://www.privacyshield.gov/>

In compliance with the Privacy Shield Principles, OcularIT commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact OcularIT at:

hr@ocularit.com | +1 (703) 463-4346

OcularIT has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

### 4. How do we use your Personal Data

Such business purposes may be:

- To fulfill the purpose for which the Personal Information is provided;
- To provide you with information, products and/or services that you request from OcularIT;
- To communicate and respond to your requests and inquiries to OcularIT;
- To operate our business and provide you with our products and services: engage in transactions with clients, and process orders from our services;
- To follow up with our products and/or services after delivering them (live chat, email, or phone inquiries).
- To provide consumers with e-mail alerts, event registrations, and other notices concerning OcularIT's products and/or services, or events or news that might be of interest to the consumer;
- To administer and improve the functionality of our Site and its technical and functional management and present its content to our clients or others;
- To analyze, develop and improve the use and performance of our Site;
- To modify, enhance, or improve our services and/or provision of such services to our clients;
- As necessary and appropriate to protect the rights, property of OcularIT, our clients, or others;
- To carry our obligations and enforce our rights arising from any agreement entered between OcularIT and a OcularIT's clients or other contractual third-party, including billing and collections;
- For testing, research, analysis, and product and services development;
- To manage the security of our Site;
- To comply with applicable law and regulations to operate our business;
- To respond to law enforcement requests as required by applicable law, court order, or governmental regulations;

As described to the consumer when collecting the consumer's Personal Information, or as otherwise as set forth by the CCPA.



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Such commercial purposes (“Commercial Purposes”) may be:

- To market our products and/or services and/or related products and services, and to tailor our marketing and sales activities to our clients’ interests.

We do not collect additional categories of Personal Information, nor process the collected Personal Information for a different purpose than the ones described on this Privacy Policy. The Personal Information we collect allows us to keep you posted on OcularIT Solutions’s latest product announcements, software updates, and upcoming events. Also, to customize the content and advertising you see on our website personalizing your experience and allowing us to deliver the type of content and product offerings you are most interested in and to send periodic emails regarding our products and/or services.

If you don’t want to be on our mailing list, you can opt-out anytime by accessing the following: [info@ocularit.com](mailto:info@ocularit.com).

### 4.1 Personal Data we collect automatically

Our website automatically collects certain data, through automatic data collection tools such as cookies, beacons, among others. These tools automatically collect the following information:

- Technical information including, but not limited to, browser type, operating system, device information, online identifiers including cookie data and Internet Protocol address (IP), domain name, referral URL, time zone setting, and/or time-stamp for your visit, information about your devices.
- Usage information including, but not limited to, geographic location information (such as your country and/or state), date and time you visited our Site, numbers and frequency visitors to our Site, page views and search queries, clickstream behaviors, among others. Also, it may include details of your use of third-party applications in connection with our service.

### 4.2 Sources of Personal Information.

Personal Information we collect from third-parties We work closely with various third parties and may receive Personal Data from them. We protect the Personal Data obtained from them in accordance with the practices and policies described herein, plus any additional obligations imposed by the third-party source of your Personal Data. The third-party sources may vary due to context, but may include the following:

- Data brokers from which we purchase data to complement the data we collect;
- Partners:
  - (i) authentication partners: if you register or log in into our services using third party credentials (e.g. Facebook) we will import your information from such third-party source to help you create an account on our website;
  - (ii) technical services partners that helps us without technology, and may provide us with certain data (e.g. such as mapping IP address to location data) to help us to provide our services,
  - (iii) advertising partners, that provide us with services on our website (analytics, marketing, etc.) providing with inferences about your preferences and interests to offer you a better service and customized offerings,

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- (iv) payment partners, if you choose to pay for a service and/or product, we may receive data from our them, to enable us to send you invoices, process your payment,
- (v) resellers, distributors, that deliver the product and/or service you have contracted, and therefore may supply us with data to help us provide improve our services, among others.

During the past 12 (twelve) months we have disclosed the categories of Personal Information about you listed above to our affiliates, group companies, and service providers for our business and commercial purposes. We have not, however, sell your Personal Information to third parties.

### 5. Legal Basis for processing your Personal Data

We rely on the following legal bases to collect and process your Personal Data under applicable EU data protection laws and regulations if you are a European Economic Area's (EEA) resident:

- Consent: where you have provided your consent for the processing of your Personal Data for a specific purpose.
- Performance of a contract: where processing is necessary for the performance of a contract with you, or taking steps prior to entering a contract with you.
- Legal obligation: where we have a legal obligation to process your Personal Data for example when answering to a public or governmental authority, courts, or regulators, according to a legal obligation under applicable law-.
- Legitimate interest: to satisfy a legitimate interest, for example when it is not required by law but it clearly benefits you.

### 6. Cookies

How OcularIT Uses Cookies and Other Technologies:

Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information. For instance, we use cookies to help us remember and process the items in your shopping cart. They are also used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services. We also use cookies to help us compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. Categories of Cookies We classify cookies in the following categories:

- Strictly Necessary Cookies are cookies that are fundamentally necessary for our website to work and allow you to use the functions of our services. Without this type of cookies, you couldn't receive the requested services. In sum, these cookies enable services that you have specifically requested and allow you to use our services. E.g. logging in. We need these Cookies to provide you with our service.
- Performance Cookies these cookies collect information about the use that visitors make of our services, such as the frequency of the visits and traffic, allowing us to improve the performance of our website. These cookies collect anonymous information about the visits on our webpages. It is used exclusively to improve the performance of our services.
- Functional Cookies these Cookies allows our webpage to remember certain type of information, such as your username, language, etc. They provide functionality and

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personalization. This information is also anonymous. These cookies remember the options you have selected to improve your experience. These Cookies allow us to adapt our services based on the provided information.

- **Targeting Cookies** may be set through our website to offer you relevant advertisements on other sites, based on your interests. These cookies collect information on your browsing habits with the purpose of adapting advertisement to your activities. In general, this information is shared with other advertisers and third parties. We may also use this information to record the number of times you have seen a particular ad and avoid showing you the same ads repeatedly.
- **Web Beacons** We may use web beacons are very small graphic image or object embedded in our web page or e-mail) to collect information about your online actions, visits to our website, and activity. We use cookies to:
  - Understand and save your preferences for future visits.
  - Compile aggregate data about site traffic and site interactions in order to offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

### How to manage Cookies

- **In your browser:** Please be aware that you may modify or withdraw your consent for the use of cookies at any time. If you do not want to receive cookies anymore, you may use your web browser either to accept them or reject them. For such a purpose, follow the instructions on your web browser. Please bear in mind, that if you set your browser to reject cookies, you may not be able to use all OcularIT Solutions's functions on the web.
- **In your device:** In your mobile device, your operative system (OS) offers options for avoiding personalized advertising -both in Ios and Android- to limit the use of information with the use of apps to generate advertisements based on your interests and tastes. Please be aware that advertisers and our partners may also use their own cookies and beacons, and unluckily we do not hold control of the information they collect. You will need to refer to their Privacy Policies. These third parties may use the information collected to serve more relevant advertisements. To configure your cookie controls and reject advertising cookies, follow the instructions on your device.

## 7. Your Rights

Under current privacy laws and regulations, CCPA, the General Data Protection Regulation (GDPR), and the Privacy Shield Framework, you are given certain rights in relation to your Personal Data. Accordingly, we are glad to offer you security, transparency, and access control to your Personal Data as available, and with the exceptions set forth on applicable laws and regulations. You have the following rights:

- **Under the GDPR:** If you are a resident from the European Economic Area (EEA) or the UK, you have the following rights regarding your Personal Data:
  - **Right of access:** you have the right to be informed and request access to the Personal Data we have collected and process about you.
  - **Right to rectification:** you have the right to request the rectification of inaccurate Personal Data concerning you, which must be duly amended or updated without undue delay.
  - **Right to erasure:** you have the right to request we delete your Personal Data.

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- Right to restriction of processing: you have the right to request us to prevent from processing your Personal Data, either all or some of your Personal Data, temporarily or permanently
- Right to data portability: you have the right to request a copy of your Personal Data in electronic format and the right to transmit those data to another controller.
- Right to object: you have the right, at any time, to object us from processing your Personal Data on grounds relating to your particular situation, and the right to object for your Personal Data to be processed for direct marketing purposes.
- Right not to be subject to automated decision making: you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

For exercising any of the aforementioned rights, please contact us or emailing us at [info@ocularit.com](mailto:info@ocularit.com). To exercise the opt-out of our marketing e-mails, please contact us at [info@ocularit.com](mailto:info@ocularit.com).

Under the CCPA: Personal Information Collected and Processed: Section 3 of this Privacy Policy describes the categories of Personal Information we collect, use and disclose, and have collected, used and disclosed for the preceding 12 (twelve months); the sources from which we obtain each category, and the purposes for which we obtain such information. If you are a resident of the state of California, USA, please be advised that you may exercise the following additional rights, under the CCPA. Under the CCPA, you have the right to request information about our data collection, this is: how we gather it, how we share it, how we sell it; and to disclose to you such information or, delete it.

A. RIGHT TO KNOW the specific pieces of information about you we collect, use, disclose or sell, or have collected, used, disclosed, or sold: You have the right to KNOW the specific pieces of information we collect, use, disclose or sell, and have collected, used, disclosed, or sold, covering the 12-month period preceding our receipt of your information request. In particular, you might request for us to disclose:

- The specific pieces of your Personal Information we collect or have collected.
- The categories of Personal Information we have to collect or have collected about you;
- The categories of sources from which we collect or have collected your Personal Information;
- The categories of your Personal Information that we sell, or have sold, disclose, or have disclosed for a business purpose;
- The categories of third parties with whom we sell or have sold, disclose, or have disclosed your Personal Information.
- The business or commercial purpose for which we have to collect, sell, or have collected or sold your Personal Information;

To make a verifiable consumer request for information about the Personal Information we have collected about you, please exercise your rights by using our Contact Form or emailing us at [info@ocularit.com](mailto:info@ocularit.com).

B. RIGHT TO DELETE your Personal Information. You also have the right to request that we delete Personal Information, subject to certain exceptions according to applicable law. You may exercise your

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right by using our Contact Form (<https://www.ocularit.com/contact-us/>) and typing in the message box “I want to permanently delete my data” or emailing us at [info@ocularit.com](mailto:info@ocularit.com).

C. RIGHT TO RECEIVE A COPY of your Personal Information: You have the right to request a copy of the Personal Information about you, we have collected. You may exercise your right by using our Contact Form (<https://www.ocularit.com/contact-us/>) and typing in the message box “I want to receive a copy of my Personal Information” or emailing us at [info@ocularit.com](mailto:info@ocularit.com).

D. RIGHT TO NON-DISCRIMINATION: You have the right not to be discriminated against by us; this is: that is us denying you goods or services, charging you a different price or rate for our goods and services, among others), as a consequence of you have exercised any of your consumer rights under the CCPA.

E. RIGHT TO OPT-OUT OF THE SALE OF YOUR PERSONAL INFORMATION: You have the right to opt-out of the sale of your Personal Information in accordance with Section 14 herein. Under the Privacy Shield Framework:

- OcularIT can be subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC)
- As an individual, under certain conditions, you can contact us to invoke binding arbitration.
- OcularIT liability about information transfer to third parties is detailed here: <https://OcularIT.com/privacy-policy/#9>

## 8. How to exercise your Rights

You might exercise any of your rights under the CCPA by submitting your request for information required to be disclosed and/or deleted by accessing our Contact Form at the following link (<https://www.ocularit.com/contact-us/>), or by contacting us at the following e-mail address [info@ocularit.com](mailto:info@ocularit.com): When receiving a verifiable consumer request, we will verify the person making a request to know or request to delete, is the consumer about whom we have collected the Personal Information. We will generally avoid requesting additional information for the consumer’s purpose of verification. However, if we cannot verify the identity of the consumer from the information already maintained by us, we may request certain additional information, that will be only used for the purposes of verifying the consumer’s identity. We will address your verifiable consumer request in an appropriate manner, according to provisions set forth on the CCPA.

Provided you have a password-protected account with us, we may verify your identity, by authenticating you through that account. Requests made through authorized agents: Please note that under the CCPA, you also may designate in a witting or through a power of attorney an authorized agent to make the request on your behalf, and exercise your privacy rights. Before accepting your agent’s request, we will take all steps necessary to verify you have duly authorized him to act on your behalf, for which they must provide us in writing a signed authorization or copy of a power of attorney. Under Argentina’s Personal Data Protection Act No. 25.326 (“PDPA”): With respect to individuals located in Argentina, the processing of their Personal Data will be based on their free, informed, and express consent, and only for the purposes described in this Privacy Policy. If you are located in Argentina you may, under certain conditions, have the right to:



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- Require us access to the Personal Data we hold about you;
- Require us to rectify the Personal Data we hold about you;
- Require us to update the Personal Data we hold about you;
- Require us to delete Personal Data (including where our processing activity is based on their consent);

Your exercise of some of these rights is subject to certain exemptions (e.g. the right for us to delete your Personal Data when we have a legal obligation to retain such data, or such deletion affects a third party). If you exercise any of these rights we will check your entitlement and respond to you within 10 (ten) days when you require access to your Personal Data or 5 (five) days when you require any rectification, update, or deletion. To exercise your rights, please contact us at [info@ocularit.com](mailto:info@ocularit.com) or at “The data subject has the right to access your personal information at intervals of not less than six months free of charge, unless there is a specified legitimate interest agreed upon by the interested party as established in section 14, paragraph 3 of Act 25,326, by submitting an email or calling to the following email address/phone number: [info@ocularit.com](mailto:info@ocularit.com)”

The AGENCY OF ACCESS TO PUBLIC INFORMATION, in its function of Controlling Entity of Act 25,326, has the attribution to attend any complaints or reports related to the infringement of personal data regulations”.

### **9. Sharing your Personal Data. Categories of third parties with whom we share your Personal Information.**

We may share your Personal Data globally with our affiliates and group companies to carry out our activities, specified in this Privacy Policy. Also, we may share Personal Data with, or subcontract processing, with third parties located in different countries than in your country. Therefore, the Personal Data we collect may be wider collected, transferred to, processes, and/or stored, in the United States or anywhere where OcularIT, its affiliates, or services providers maintain facilities. A such, your Personal Data, may be subject to privacy laws from different countries than yours. In this regard, we may share your Personal Information with:

- our affiliates: to provide our services and/or products;
- our service providers: that help us conduct our business and support infrastructure, payment processors when you purchase our products and/or services;
- advertising partners;
- Channel Partners;
- Vendors and Agents;
- Suppliers;
- For business transfers: we share your Personal Data in those cases where we sell or negotiate to sell our business to a buyer or potential buyer. In this case, we will continue to ensure the security and confidentiality of your Personal Data, and give you notice before your Personal Data is transferred to a buyer or becomes subject to a different privacy policy;

Others.

Transfer of your Personal Data to other countries In some cases, our third-party service providers are located outside the EEA, meaning your Personal Information may be processed or stored in other

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countries. In certain circumstances, our service providers may be required to disclose information to government authorities, regulators, courts, or law enforcement in those countries. When your Personal Data is transferred internationally to third parties located in territories which may not offer an equivalent level of protection to privacy as that applicable within your country of residence (Personal Data collected within the European Economic Area (EEA), for example, may be transferred to be processed by third countries located outside the EEA), we ensure that the transfer of your Personal Data is carried out in accordance with applicable privacy laws and that appropriate technical and organizational security measures are taken. We will take all the necessary steps to verify that your Personal Data receives an adequate or substantially equal (where required by local law) level of protection. This, by entering into Data Transfer Agreements (“DTA’s”) pursuant to applicable law, such as the Model Clauses of EU Directive 87/2010, valid as set forth by Section 47 of the GDPR, or Corporate Binding Rules as an option to the referred DTA’s, when the international transfer of Personal Data is made among companies of the same economic group, to countries that do not count with an adequate level of protection in accordance to the terms of applicable law.

### 10. Links to Third-Party Websites

We may display advertisements from third parties and other content on our website that may link you to third parties’ websites. We cannot control nor hold responsible for such content and the third-party’s privacy policies. If you click and access a third-party advertisement or link, please understand that you are leaving OcularIT, and any Personal Data you provided will not be covered by this Privacy Policy. Please refer to the third-party Privacy Policy to find out how they collect and process your Personal Data.

### 11. Data retention and deletion

We will keep your Personal Data as long as necessary to fulfill the purposes described herein. Upon your request, we will delete your Personal Data, unless we are allowed or required to keep certain Personal Data, for example, to fulfill a legal obligation or to resolve a dispute, etc.

### 12. Keeping Your Personal Data Safe

We are firmly committed to the security of your Personal Data. We will make our best efforts to protect your Personal Data, by implementing adequate technical, physical, administrative, and organizational measures, in order to guarantee the security of your information. We have implemented several measures such as (encryption, pseudonymization, among other measures to protect your information). However, please be advised that no system is ever a complete secured system, and you can decide not to use our products and/or services. We also encourage you to take all possible measures to secure your Personal Data by using a safe strong password, never sharing your password with others, logging out of the account, immediately after having used the account, among others.

### 13. Data Breaches

Despite our best efforts to guarantee the maximum possible level of security of your information by adopting technical and organizational measures to contribute to the security of your data, provided we

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suffer a data breach, we will take all necessary measures to reduce its effects. In accordance with the terms of the GDPR and the CCPA accordingly, without undue delay and, where feasible, after having become aware of it, we will notify the Personal Data breach to the supervisory authority and/or to you, as appropriate under the terms of the GDPR or CCPA accordingly.

### **14. Sale of Personal Information/Right to Opt-out of the sale of your Personal Information**

The CCPA gives California residents the right to opt-out from the sale of Personal Information. We do not sell information that directly identifies you. We do not exchange information about you to third parties in exchange for money or other consideration. We share information with third parties who work with us, as explained in previous sections, for the purposes described herein. However, due to the broad definition of “sale” of Personal Information under CCPA, including the provision of Personal Information to another business or third party for monetary and other valuable consideration, shall you prefer for us not to sell your Personal Information, please access the following link, in order to opt-out of the future sale of your Personal Information or contact us to the following [info@ocularit.com](mailto:info@ocularit.com).

### **15. Children**

We protect our children. Our services are not directed to children under the age of 13 years, or from ages from 13 to 16, or equivalent minimum age in the relevant jurisdiction. If you are under the age limit of 13 years, or from 13 to 16 years old, please do not use our services and do not provide us with any Personal Data or information. We will not collect, process nor sell the Personal Information of users under 13 years of age, or from 13 to 16 years, if we have actual knowledge that the user is less than those years of age.

### **16. Where do we store your Personal Information**

Your Personal Data will be stored in OcularIT’s databases.

### **17. Updates to this Privacy Policy**

We may from time to time make changes to this Privacy Policy. We encourage you to review it regularly to learn how we are protecting your privacy. We will post any changes to this policy on this page and we will also contact you via your contact information, for example by email. Each version of this policy is identified at the bottom of the page by its effective date.

### **18. How to contact us**

Thanks for reading our Privacy Policy. If you have any questions, requests, comments, and/or concerns regarding this Privacy Policy, please contact us at the following e-mail: [info@ocularit.com](mailto:info@ocularit.com). Last updated: November 16th, 2020