

Privacy Statement

SoftIron, Ltd. and its subsidiaries (collectively "SoftIron") are committed to protecting your personal data and providing you with a positive experience when visiting our websites and using our products and services ("Solution" or "Solutions").

This Privacy Statement applies to SoftIron websites and Solutions that link to or reference this Statement and describes how we handle personal information and the choices available to you regarding collection, use, access, and how to update and correct your personal information. Additional information on our personal information practices may be provided in offer descriptions, supplemental privacy statements, or notices provided prior to or at the time of data collection. Certain SoftIron websites may have their own privacy statement that describes how we handle personal information for those websites specifically. To the extent a notice provided at the time of collection or a website or Solution specific privacy statement conflict with this Privacy Statement, such specific notice or supplemental privacy statement will control.

Collecting Your Personal Information

SoftIron may collect data, including personal information, about you as you use our websites and Solutions and interact with us, for example, when you complete a web form to request information about a product. "Personal information" is any information that can be used to identify an individual, and may include; name, address, email address, phone number, login information (account number, password), marketing preferences, social media account information, or payment card number. If we link other data with your personal information, we will treat that linked data as personal information. We also collect personal information from trusted third-party sources and engage third parties to collect personal information to assist us. SoftIron collects personal information for a variety of reasons, such as:

- Providing customer service
- Processing an order, including payment transactions
- Sending marketing communications
- Creating an account on a website or within a Solution
- Enabling the use of certain features of our Solutions
- Personalizing your SoftIron website and/or Solution experience
- Managing and processing a job application or job transfer
- Providing you with a newsletter subscription
- When a computer-based certification test is administered to you



SoftIron and the third parties we engage with may combine the information we collect from you over time and across our websites and Solutions with information obtained from other sources. This helps us improve its overall accuracy and completeness, and also helps us better tailor our interactions with you.

If you choose to provide SoftIron with a third party's personal information (such as name, email, and phone number), you represent that you have the third party's permission to do so. Examples include forwarding reference or marketing material or sending job referrals. Third parties may unsubscribe from any future communication by following the link provided to our Data Subject Access Request form (referred to as DSAR throughout the document).

In some instances, SoftIron and the third parties with whom we engage, may automatically collect data through cookies, web logs, web beacons, and other similar applications. This information is used to better understand and improve the usability, performance, and effectiveness of the website and to help tailor content or offers for you. Please read the "Cookies and Web Technologies" section below for more information.

Uses of Your Personal Information

SoftIron may use your personal information for the purposes of;

- Performing a contract we have with you, or where it is necessary for legitimate interests,
- Operating our business,
- Delivering, improving, and customizing our websites and Solutions,
- Sending marketing and other communications related to our business,
- For other legitimate purposes permitted by applicable law or to comply with a legal or mandatory obligation.

Some of the ways we may use personal information include:

- Delivering a Solution You Have Requested
- Sending communications to you, including for marketing or customer satisfaction purposes, either directly from SoftIron or from our partners
- Analyzing, supporting, and improving our Solutions and your online experience
- Personalizing websites, newsletters and other communications
- Administering and processing your certification exams

You can edit your communication preferences at any time. For more information please see "Selecting Your Communication Preferences" below.

Access to and Accuracy of Your Personal Information

Some SoftIron entities may act as or be considered "data controllers". When a SoftIron entity is acting as a data controller, you can exercise your rights of access and request corrections, suppression, or deactivations under applicable data protection laws directly with that SoftIron



entity as described in the specific Solution documentation. If you need additional assistance, or help with accessing, correcting, suppressing, or deleting your personal information, please feel free to contact us directly via the DSAR form. We make good faith efforts to honor reasonable requests to access, delete, update, suppress, or correct your data. We will respond to your request within 30 days. If we are unable to honor your request, we will provide you with an explanation. Under certain circumstances, you have rights under data protection laws in relation to your personal data eg. request access, correction, erasure of your personal data. Should you wish to exercise those rights, for example, obtain a copy of the personal data held about you or issue a data subject access request, please submit a request using DSAR form. Please note that we may need to request specific information from you to help us confirm your identity and right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Selecting Your Communication Preferences

SoftIron gives you the choice of receiving a variety of information related to our Solutions. You can manage your communication preferences through the following methods:

By following the instructions included in each promotional email from us to unsubscribe from that particular mailing. By sending us a message through email or by mail to: privacy@softiron.com. Please be sure to include your name, email address, and specific, relevant information about the material you no longer wish to receive. These choices do not apply to service notifications or other required communications that are considered part of certain Solutions, which you may receive periodically unless you stop using or cancel the Solution in accordance with its terms and conditions.

With your permission, we may also share your personal information with SoftIron business partners or vendors, so they may send you information about products or services that may be of interest to you. To opt-out of receiving information from third parties for their marketing purposes, please use our DSAR form.

By using our websites, Solutions, or otherwise providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use. For example, if we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our websites, by sending an email, or otherwise contacting you.

Sharing Your Personal Information

SoftIron may share your personal information with third parties for the purposes of operating our business, delivering, improving, and customizing our Solutions, sending marketing and other



communications related to our business, and for other legitimate purposes permitted by applicable law or otherwise with your consent.

SoftIron may share personal information in the following ways:

- Within SoftIron and any of our global subsidiaries for purposes of data processing or storage.
- With SoftIron business partners or vendors, so that they may share information with you about their products or services. To opt-out of SoftIron sharing with third parties for their marketing purposes, please contact us via DSAR.
- With business partners, service vendors, authorized third-party agents, or contractors to provide a requested Solution, service or transaction. Examples include, but are not limited to: processing of orders and credit card transactions, hosting websites, hosting seminar registration, assisting with sales-related efforts or post-sales support, and providing customer support.
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company.
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation or legal process.
- With law enforcement officials, government authorities, or other third parties as necessary to comply with legal process or meet national security requirements; protect the rights, property, or safety of SoftIron, its business partners, you, or others; or as otherwise required by applicable law.
- In aggregated and/or anonymized form which cannot reasonably be used to identify you.
- If we otherwise notify you and you consent to the sharing.

Security of Your Personal Information

We intend to protect the personal information entrusted to us and treat it securely in accordance with this Privacy Statement. SoftIron implements physical, administrative, and technical safeguards designed to protect your personal information from unauthorized access, use, or disclosure. We contractually require that our suppliers protect such information from unauthorized access, use, and disclosure. The Internet, however, cannot be guaranteed to be 100% secure, and we cannot ensure or warrant the security of any personal information you provide to us.

Retention of Personal Information

We will only retain your personal information for as long as necessary to fulfill the purposes for which it was collected. We will retain and use your personal information as necessary to comply



with our business requirements, legal, accounting or reporting obligations, resolve disputes, protect our assets, and enforce our agreements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Use of Cookies and Web Technologies

Like many websites, SoftIron uses automatic data collection tools, such as cookies, embedded web links, and web beacons. These tools collect certain standard information that your browser sends to our website such as your browser type and the address of the website from which you arrived at our website. They may also collect information about:

- Your Internet Protocol (IP) address. This is a number automatically assigned to your computer or device whenever you are connecting to the Internet. It allows web servers to locate and identify your device, this is a unique address assigned to your device by your Internet service provider or information systems department on a TCP/IP network.
- Clickstream behavior. For example, the pages you view and the links you click.
- These tools help make your visit to our website easier, more efficient, and more valuable by providing you with a customized experience and recognizing you when you return.

The SoftIron website includes widgets, which are interactive mini-programs that run on our site to provide specific services from another company (such as displaying the news, opinions, music, and more). Personal information, such as your email address, may be collected through such widgets. Cookies may also be set by widgets to enable it to function properly. Information collected by widgets is governed by the privacy policy of the company that created the widget. Some web browsers may give you the ability to enable a "do not track" feature that sends signals to the websites you visit, indicating that you do not want your online activities tracked. This is different than blocking or deleting cookies, as browsers with a "do not track" feature enabled may still accept cookies. There is currently no industry standard for how companies should respond to "do not track" signals, although one may develop in the future. Our websites do not recognize and respond to "do not track" signals at this time. If we do so in the future, we will describe how in this Privacy Statement.

SoftIron partners with third parties to either display advertising on our website or to manage our advertising on other sites. Our third party partners may use cookies or similar technologies in order to provide you with advertising based upon your browsing activities and interests. If you wish to opt-out of interest-based advertising, please submit your request via DSAR form. Please note, generic, non-personalized ads will continue to be displayed.



Linked Websites

We may provide links to other third-party websites and services that are outside our control and not covered by this Privacy Statement. We encourage you to review the privacy statements posted on those websites (and all websites) you visit.

Forums and Chat Rooms

If you participate in a discussion forum, local communities, or chat room on a SoftIron website, you should be aware that the information you provide there (i.e. your public profile) may be made broadly available to others, and could be used to contact you, send you unsolicited messages, or for purposes neither SoftIron nor you have control over. Also, please recognize that individual forums and chat rooms may have additional rules and conditions. SoftIron is not responsible for the personal information or any other information you choose to submit in these forums. To request removal of your personal information from our blog or community forum, contact us at community@softiron.com. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

Children's Privacy

SoftIron encourages parents and guardians to take an active role in their children's online activities. SoftIron does not knowingly collect personal information from children without appropriate parental or guardian consent. If you believe that we may have collected personal information from someone under the applicable age of consent in your country without proper consent, please let us know by emailing privacy@softiron.com, and we will take appropriate measures to investigate and address the issue promptly.

Consent to Transfer, Processing and Storage of Personal Information

As SoftIron is a global organization, we may transfer your personal information to SoftIron in the United States of America, to any SoftIron subsidiary worldwide, or to third parties and business partners as described above that are located in various countries around the world. By using our websites and Solutions or providing any personal information to us, where applicable law permits, you consent to the transfer, processing, and storage of such information outside of your country of residence where data protection standards may be different.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.



- Where we use certain specific providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

Your California Privacy Rights

Residents of the State of California, under California Civil Code § 1798.83, have the right to request, from companies conducting business in California, a list of all third parties to which the company has disclosed personal information during the preceding year for direct marketing purposes. Alternatively, the law provides that if the company has a privacy policy that gives either an opt-out or opt-in choice for use of your personal information by third parties (such as advertisers) for marketing purposes, the company may instead provide you with information on how to exercise your disclosure choice options.

SoftIron qualifies for the alternative option. We have a comprehensive privacy statement, and provide you with details on how you may either opt-out or opt-in to the use of your personal information by third parties for direct marketing purposes. Therefore, we are not required to maintain or disclose a list of the third parties that received your personal information for marketing purposes during the preceding year.

If you are a California resident and request information about how to exercise your third party disclosure choices, please email us your request at privacy@softiron.com.

How to Contact Us

We value your opinions. Should you have questions or comments related to this Privacy Statement, please email privacy@softiron.com.

Updates to this SoftIron Privacy Statement

We may update this Privacy Statement from time to time. If we modify our Privacy Statement, we will post the revised version here, with an updated revision date. You agree to visit these pages every now and then to be aware of and review any such revisions. If we make material changes to our Privacy Statement, we may notify you by other means prior to the changes taking effect, such as by posting a notice on our websites or sending you a notification. By continuing to use our website after such revisions are in effect, you accept and agree to the revisions and to abide by them.

This Privacy Statement was last updated on June 13, 2018.