

Privacy Shield Data Privacy Statement

Axonom & NetPRM

Effective and last revised October 26, 2020

Available at: <http://www.axonom.com/Data/Sites/1/media/documents/external/AxonomPrivacyShieldDataPrivacyStatement.pdf>

Axonom Inc. and its affiliated U.S. entities ("the Company," "we," "us," or "our") adhere to the EU-US Privacy Shield Framework published by the U.S. Department of Commerce ("Principles", "Privacy Shield" or "Privacy Shield Program").

This statement outlines our policy and practices for implementing the Privacy Shield Program, including the types of personal data the Company gathers, how we use it, and the choices affected individuals have regarding our use of, and their ability to correct, the personal data relating to them. If there is any conflict between this statement and the Principles, the Principles will govern. To learn more about the Privacy Shield Programs, and to view Axonom's certification, please visit: <https://www.privacyshield.gov/list>.

This policy applies to personal data we handle. For purposes of this statement, "personal data" means information that:

- Is transferred from the European Economic Area (EEA) to the United States in reliance on the Privacy Shield Framework;
- Is about, or pertains to, a specific individual; and
- Can be linked either directly or indirectly to that individual.
- We also have other data mechanisms in place that ensure the security of data flows, such as SAAS Contract Clauses and Service Level Agreements.

Principles Protecting Individuals' Privacy Notice and Choice

We notify individuals about the personal data we collect from them, how we use it and how to contact us with privacy concerns.

We provide such notice through this statement, our contracts, Statements of Work, letters or other similar documents, and direct communication with individuals from whom we collect personal data.

We collect and process personal data about Company personnel for the purpose of human resources administration and recruitment following the Privacy Shield Program.

We collect and process personal data about our customers and their personnel for the purpose of rendering computer services to our clients.

We collect personal data from individuals only as permitted by the Privacy Shield Program.

Consent for personal data to be collected, used, and/or disclosed in certain ways (including opt-in consent for sensitive data) may be required in order for an individual to obtain or use our services. This consent, is provided through this statement, our contracts, Statements of Work, letters or other similar documents, and direct written communication with individuals from whom we collect personal data.

Disclosures and Transfers

We do not disclose an individual's personal data to third parties, except when one or more of the following conditions is true:

- We have the individual's permission to make the disclosure.
- The disclosure is required by lawful request by public authorities, including to meet national security or law enforcement requirements. Axonom is also subject to the authority of the Federal Trade Commission.
- The disclosure is required by law or mandatory professional standards.
- The disclosure is reasonably related to the sale or other disposition of all or part of our business.
- The information in question is publicly available.
- The disclosure is reasonably necessary for the establishment of legal claims.
- The disclosure is to persons or entities providing services on our or the individual's behalf (each a "transferee"), consistent with the purpose for which the information was obtained, if the transferee, with respect to the information in question:
 - Is subject to law providing an adequate level of privacy protection; or
 - Has agreed to provide an adequate level of privacy protection.

We may transfer personal data from one jurisdiction to another. Privacy laws vary by jurisdiction, and some may provide less or different legal protection than others. However, the Company will protect personal data in accordance with the Privacy Shield Program regardless of the jurisdiction in which the data resides.

The Company is responsible for the third party acts within its control that result in the processing of personal data inconsistent with the Privacy Shield Program.

Data, Security, Integrity and Access

We employ various physical, electronic, and managerial measures, including education and training of our personnel, designed to reasonably protect personal information from loss, misuse or unauthorized access, disclosure, alteration or destruction. Personal data collected or displayed through a website is protected in transit by standard encryption processes. However, we cannot guarantee the security of information on or transmitted via the Internet.

We process personal data only for the limited and specific purpose for which it was originally collected or authorized by the individual. To the extent necessary for such purposes, we take reasonable steps so that personal data is accurate, complete, current, and otherwise reliable with regard to its intended use.

An individual has the right to access personal data the Company holds about them as specified by the Privacy Shield Program. An individual may contact us using the information below to correct, amend, or delete information where it is inaccurate or has been processed in violation of the principles. The individual will need to provide sufficient identifying information, such as name, address, and birth date.

We may request additional identifying information as a security precaution such as possibly a national identifier (e.g. a Social Security number). In addition, we may limit or deny access to personal information where providing such access would be unreasonably burdensome or expensive in the circumstances, or where the rights of persons other than the individual would be violated. In some circumstances, we may charge a reasonable fee, where warranted, for access to personal information.

Accountability and Enforcement

We have established a program to monitor our adherence to the Privacy Shield Program and to address questions and concerns regarding our adherence. This program will include a statement, at least once a year, signed by an authorized representative of the Company, verifying that this statement is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented, and accessible. We encourage interested persons to raise any concerns with us using the contact information below.

Individuals may file a complaint with our US headquarters in connection with the Company's processing of their personal data under the Privacy Shield Program. With respect to any dispute relating to this policy that cannot be resolved through our internal processes:

- If the dispute involves data collected in the context of an employment relationship, we will cooperate with competent EU data protection authorities and comply with the advice of such authorities. In the event that we or such authorities determine that we did not comply with this policy, we will take appropriate steps to address any adverse effects and to promote future compliance.
- If the dispute involves other types of data, individuals may file a claim with Judicial Arbitration and Mediation Services (JAMS) at <https://www.jamsadr.com/eu-us-privacy-shield>.
- Personnel who violate our privacy policies will be subject to disciplinary process.

An individual may under certain conditions invoke binding arbitration. Please see the Privacy Shield website for more information on conditions giving rise to binding arbitration.

Amendment

We may amend this policy from time to time by posting a revised policy on this website, or a similar website that replaces this site. If we amend the policy, the new policy will apply to personal data previously collected only insofar as the rights of the individual affected are not reduced. So long as we adhere to the Privacy Shield Program, we will not amend our policy in a manner inconsistent with the Privacy Shield Program.

Information Subject to Other Policies

We are committed to following the Principles for all personal data within the scope of the Privacy Shield Program. However, certain information is subject to policies of the Company that may differ in some respects.

Information relating to present or former Company personnel is subject to our policies concerning personnel data privacy, which are available to current and past Company personnel upon request.

Information obtained from or relating to customers or former customers is further subject to the terms of any privacy notice to the client, any contracts or other similar letters or agreements with the client, and applicable laws and professional standards.

Contact Information

For further information or to file a complaint, please contact us.

Axonom Inc.
Privacy Office
11010 Prairie Lakes Drive, Suite 375
Eden Prairie, MN 55344

The “Company” refers to Axonom Inc. and its wholly-owned subsidiary, NetPRM Inc.