

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

External Privacy Statement

Strasmore considers user privacy paramount, and Strasmore utilizes great care in keeping the information of the customer and/or user ("**Customer**") private and secure. Strasmore respects the privacy of every person who visits or registers with www.strasmore.com and www.ssdnodes.com (the "**Site**" individually or "**Sites**" collectively) and is further committed to ensuring a safe online experience. Strasmore also respects the privacy of every person who uses the services that Strasmore makes available from the Sites or who engages with Strasmore to use the services that are provided (be it through the Sites or not) ("**Services**") or whose personal information may be processed as a result of others' use of the Services.

Purpose of this Statement

This privacy statement ("**Privacy Statement**") explains Strasmore's collection of any personal information that Strasmore may obtain about you from you or a third party and the purposes for which Strasmore may process such information. This Privacy Statement also sets out your rights in respect to Strasmore's processing of your personal information. The purpose of this Privacy Statement is also to comport to applicable data privacy laws and, if applicable, the **DP Laws** (as defined near the end of this Privacy Statement).

This Privacy Statement informs you of the nature of the information that is collected and processed by Strasmore and how you can request that Strasmore deletes, updates, transfers and/or provides you with access to it.

This Privacy Statement is intended to help you make an informed decision when using the Sites and Strasmore's Services and/or to understand how your information may be processed by Strasmore as a result of your use of and the function of the Services. Please read this Privacy Statement carefully so that you understand it. Please note that when using the Sites it should be read in conjunction with Strasmore's Terms of Service, as may be updated from time to time.

Please also note that this Privacy Statement only applies to the use of your personal information obtained by Strasmore, it does NOT apply to your personal information that is collected during your communications with third parties.

STRASMORE AND WHAT STRASMORE DOES

Strasmore is a Delaware, United States corporation whose registered address is 2522 Chambers Road Suite 100, Tustin, CA 92780. Strasmore is the data controller responsible for your personal information processed via the Sites.

HOW TO CONTACT US?

If you have any questions about this Privacy Statement or want to take any action with respect to your personal information as set out in this Privacy Statement, you must contact Strasmore by:

1. **Sending a letter to:** c/o Legal Department, Strasmore, 2522 Chambers Road Suite 100, Tustin, CA 92780; or
2. **Sending an Email to:** legal@ssdnodes.com

Types of Data Collected

Strasmore's primary goal in collecting personal information from you is to: (1) verify your identity; (2) help Strasmore deliver the Services; (3) improve, develop and market new Services; (4) carry out requests made by you on the Sites or in relation to Strasmore's Services; (5) investigate or settle inquiries or disputes; (6) comply with any applicable law; (7) enforce Strasmore's agreements with you; (8) protect the rights, property or safety of Strasmore or third parties, including Strasmore's other customers, subscribers and users of the Sites or Strasmore's Services; (9) provide support for the provision of Strasmore's Services; and (10) use as otherwise permitted by law.

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

To undertake these goals, Strasmore may collect the following personal information related to our users:

If you are a visitor to the Sites:

- Name (If you enter it)
- E-mail address (If you provide it)
- IP Address saved by Strasmore's web server logs
- Third-party service vendor data, as collected by such third-party (including HotJar, VWO and Google Analytics)

If you are an individual user of the Services or Sites:

- Name and job title
- E-mail address
- Home address
- Company name/employer name
- Telephone/mobile phone number

If you commence a financial transaction on the Sites, then in addition to the personal information above:

- Last 4 digits of the credit card number
- Expiration date and issuing bank
- Payment information
- Third-party vendor payment processor required information

Strasmore may also collect information about your use of the Sites including:

- Electronic communications protocols
- Web pages visited
- Cookies
- User preferences
- User privileges
- Other information relevant to provision of the Services
- Other information as may be requested by Strasmore from you in relation to provision of the Services
- Third-party monitoring related to web traffic

Collection of the personal information described above may be through the following methods:

- Automated means such as communication protocols and cookies
- Online registration and online signup forms
- Sales inquiries and transactions
- Online Customer communications
- Offline communications and interactions
- Third party sources of information

Electronic Communications Protocols and Cookies

Strasmore may receive data from you as part of the communication connection itself through the standard electronic greeting between your computer and Strasmore's servers. This information often consists of network routing (where you came from), equipment information (browser type), internet protocol address, date and time. At this time Strasmore's server will also query your computer to see if there are "cookies" previously set by our Site(s) to facilitate log in or other site navigation procedures. A "cookie" is a small piece of information sent by a web server to store in a web browser so it can later be read back from that browser.

© 2011-2018 Strasmore, Inc. Effective May 25, 2018

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

Cookies: Some parts of the Strasmore site use cookies (including signup forms) to collect information about visitors' use of the web site and to facilitate return visits. The information collected from cookies is tracked to enhance security and/or to improve the functionality of the web site by avoiding duplicate data entry, facilitating navigation, and increasing the relevance of content.

Cookies on the site may collect the following information: a unique identifier, user preferences and profile information used to personalize the content that is shown, and user information to access Strasmore's user forums. Some cookies used by our Site(s) may remain on the user's computer after they leave the web site, but the majority is set to expire within thirty ("30") – three hundred sixty five ("365") days. There may be some cookies on certain tools that are of longer duration. Cookies may also be of benefit to you by creating a more streamlined login process, keeping track of shopping cart additions or preserving order information between sessions. In the future, as we enable further customization of the site, cookies will help in ensuring that information provided to you will be the most relevant to your needs.

While Strasmore does not offer an opt-out on the site for cookies, browsers provide you with information and control over cookies. You can set your web browser to alert you when a cookie is being used. You can also get information on the duration of the cookie and what server your data is being returned to. You then have the opportunity to accept or reject the cookie. Additionally, you can set your browser to refuse all cookies or accept only cookies returned to the originating servers. Users can generally disable the cookie feature on their browser without affecting their ability to use the site, except in some cases where cookies are used as an essential security feature necessary for transaction completion.

How We Use Your Data?

Strasmore collects data from users for the following purposes and may share it in accordance with the following descriptions of Strasmore's use of your data:

- **To Engage In Transactions For Service:** Your name, address, email, purchase details, and credit card/payment information may be collected and stored as part of the transaction history and may be used by Strasmore to enable us to perform the Services.
 - Strasmore will not transfer information to any of its Agents unless it first either ascertains that the Agent subscribes to the Safe Harbor Principles or is subject to the **DP Laws** as defined at the end of this Privacy Statement or another adequacy finding or enters into a written agreement with such Agent requiring that the Agent provide at least the same level of privacy protection as is required by the relevant Safe Harbor Principles.
- **To Provide Future Service And Support.** Information collected for this purpose is both contact data and information related to products and service/support requested. This information is also used to provide service, product updates, and similar notices.
- **To Select Content.** Data may be collected to help create web site content and navigation that is most relevant and user friendly. This includes data collected as a result of site navigation, as well as data provided in forms.
- **To Respond To User Inquiries And Requests For Information.** This data includes registrations for online newsletters, opt-in mailing lists and specific requests for further information.
- **To Respond To Regulators.** Data is used to respond to law enforcement organizations, government officials, or third parties when compelled by subpoena, court order, or applicable law, or to report or prevent suspected fraudulent or illegal activity in the use of Strasmore's services. Strasmore will notify Customer of the information request or submission as, and if, allowed.
- **When You Consent to Share Information to/for Relevant Programs or Online Accounts.** To provide various Strasmore communities, such as resellers, with relevant product alerts and updates. These updates are related to product releases, prices, terms, special offers and associated campaigns. This data is sent when the program member signs up for the relevant program or online account.
- **For Strasmore's Marketing to You.** We may use information from user purchases and user-specified requirements to provide you with timely and pertinent notices of Strasmore product releases and service developments that address your needs and specified requirements and/or which are similar to products and services previously purchased by the user from Strasmore.

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

- **For Services and Quotes for Products/Equipment.** We may use data to better respond to requests for service or quotes for product and equipment purchase. Strasmore will pass contact information to the appropriate Strasmore sales person, or reseller for follow-up related to Strasmore products or services.
- **From Referral "Tell A Friend" Function.** If a user elects to use our referral service for informing a friend about our site, we ask them for the friend's name and email address. Strasmore will automatically send the friend a one-time email inviting them to visit the site and send a copy of said e-mail to the user. The e-mail(s) sent shall clearly identify the sender of such email(s). Strasmore uses this data for the sole purpose of sending this one-time email. Such email sent to a friend at user's request will not be stored for additional processing.
- **For Data Related of Your Use of the Interactive Discussion Portions of the Sites.** As a result of your participation in interactive discussions and public forums. There are parts of the web site that permit you to participate in interactive discussions. Some of these are moderated; all are subject to access for technical reasons. Strasmore does not control the content that users post and some may serve as public discussion forums. As in any interactive forum open to many users, you should carefully consider whether you wish to submit data and should tailor any other content submitted accordingly.

Does Strasmore Share Your Personal Data?

Strasmore may share your information that you share with Strasmore's chat software if you provide such information including name and email address, including intercom.io and customer.io which are used by Strasmore to send emails to its customers.

Who Does Strasmore Share Your Personal Information With?

Strasmore does not share your data with any third-parties to perform the Services except that various vendors that are performing maintenance on the Sites may have limited temporary access to your information, however, Strasmore has agreements in place with such vendors in order to prevent their use of your information in any way.

What is Strasmore's Legal Basis for Sharing Your Personal Data?

It is necessary for Strasmore to use your personal information to perform our obligations in accordance with any contract that we may have with you or it is in our legitimate interest or a third party's legitimate interest to use personal information in such a way to ensure that we provide the Services in the best way that we can.

Marketing Communications.

We carry out the following marketing activities using your personal information:

- **Postal Marketing.** We use information that we observe about you from your interactions with our Sites, and/or with Services and/or your address details, to send you marketing communications by mail/post.
 - **Who do we share your personal information with for these purposes?** We share your personal information with a variety of third party postal providers who assist us in delivering our postal marketing campaigns to you, including the post office.
- **Email Marketing**
 - Customer.io, Intercom.io
- **Online Personalized Advertising**
 - Reddit, Facebook, Twitter
- **AdWords-Google**

How do We Obtain Your Consent?

Where Strasmore's use of your personal information requires your consent, you can provide such consent:

- At the time Strasmore collects your personal information following the instructions provided; or
- By informing us by e-mail, mail/post or phone using the contact details set out in this Privacy Statement in the "How to Contact Us" section above.

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

Client Area, Customer Customization, Preferences and Opt-Out

New Customers are automatically registered for access at <https://www.ssdnodes.com/manage> that is utilized to manage the Sites. The Client Area allows Customers the ability to view services and opt in (or out) of services.

Strasmore has also provided the Customer's master user the ability to manage the Customer's account or profile information. Strasmore maintains the data and allow the Customer's master user to update it at any time. To change this information, you must be a current Customer and login with a user ID and password and follow the prompts to "My Details." We continue to expand the profile of services and information that you may access and update. Please note that some email communications are not subject to general opt-out. These include communications related to downloads; communications about sales transactions; information about software updates, patches and fixes; disclosures to comply with legal requirements; and network upgrades or other related service maintenance.

If an individual's personal information is to be (a) disclosed to a third party who is not an Agent; or (b) used for a purpose that is incompatible with the purpose(s) for which it was originally collected or subsequently authorized by the individual, then the individual will be notified prior to such disclosure and may opt out of having the information disclosed by responding to the email and/or author of the notification, where such information shall be clearly set forth.

Requests to View or Delete Your Personal Information/Rights to Access

In compliance with applicable data privacy laws including the DP Laws (as defined herein), You may request to view or have your personal information and data that Strasmore collects, deleted from the Sites by contacting the email listed above in the Section entitled "How to Contact Us". Strasmore will respect and comply with your request by the later of (60 days) a reasonable time or (120 days) any required timeframe required by applicable data privacy laws or the DP Laws, as applicable.

Based on where you live, you may have additional rights, if applicable under relevant DP Laws, including the rights to:

- Access your personal information data;
- Rectify the data if it is incomplete,
- Restrict the processing of your data,
- Object to processing of your data,
- Lodge complaints with supervising authority,
- Withdraw your consents to Strasmore's use of your data,
- Not be subject to automated decision making and profiling,
- Limited rights to port your data.

How Long Do We Keep Your Personal Information For?

Unless we are instructed otherwise by yourself or any regulatory body, then Regarding visitors to the Sites, Strasmore will retain relevant personal information for at least 3 years from the date of Strasmore's last interaction with you and in compliances with our obligations under the applicable data privacy laws or DP Laws as applicable.

Unless we are instructed otherwise by yourself or any regulatory body, then regarding personal information Strasmore has processed as part of providing the Services to any client/customer, Strasmore will retain relevant personal information for at least 3 years from the date of Strasmore's last interaction with that client/customer compliances with our obligations under the applicable data privacy laws or DP Laws as applicable.

If personal information is only useful for a short period e.g. for specific marketing campaigns or limited usage then Strasmore will delete such personal information.

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

Security

Strasmore is concerned with the security of the data we have collected and utilizes commercially reasonable measures to prevent unauthorized access to that information. These measures include policies, procedures, employee training, physical access and technical elements relating to data access controls. In addition, Strasmore uses standard security protocols and mechanisms to facilitate the exchange and the transmission of sensitive data, such as credit card details. Strasmore does not process personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual.

Strasmore has implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- Unauthorized access;
- Improper use or disclosure;
- Unauthorized modification; and
- Unlawful destruction or accidental loss.

In the event that individual personal data is acquired, or is reasonably believed to have been acquired, by an unauthorized person and applicable law requires notification, Strasmore will notify the affected individual of the breach by email or fax or, if Strasmore is unable to contact the individual by email or fax, then by regular mail. Notice will be given promptly, consistent with the legitimate needs of law enforcement and any measures necessary for Strasmore or law enforcement to determine the scope of the breach and to ensure or restore the integrity of the data system. Strasmore may delay notification if Strasmore or a law enforcement agency determines that the notification will impede a criminal investigation, and in such case, notification will not be provided unless and until Strasmore or the agency determines that notification will not compromise the investigation.

Enforcement

Strasmore has established internal mechanisms to verify its ongoing adherence to its privacy policy, including the Safe Harbor Principles. Strasmore also encourages individuals covered by this privacy policy to raise any concerns about our processing of personal information by contacting Strasmore at the address below. Strasmore will seek to resolve any concerns. Strasmore has also agreed to participate in the dispute resolution program provided by the European Data Protection Authorities.

Data Protection Laws (If Applicable to You based On Your Citizenship)

For purposes of this Privacy Statement, "DP Laws" means any applicable data protection laws relating to the protection of individuals with regards to the processing of personal data including (i) EU Data Protection Directive 95/46/EC ("DP Directive") as implemented by EU member states, (ii) the General Data Protection Regulation (EU) 2016/679 ("GDPR"), from 25 May 2018, (iii) laws implemented by EU member states which contain derogations from, or exemptions or authorizations for the purposes of, the GDPR, or which are otherwise intended to supplement the GDPR, (iv) Directive 2002/58/ec ("ePrivacy Directive") as implemented by EU member states or in the UK (as may be updated or replaced) or any other law relating to data protection, the processing of personal data and privacy as a consequence of the United Kingdom leaving the European Union; and/or (vi) any corresponding or equivalent national laws or regulations including any amendment, update, modification to or re-enactment of such laws.

Privacy Statement Updates

If we are going to use your data in a manner different from that stated at the time of collection, we will notify you via email. However, Strasmore strives to maintain a static data collection and processing process and will make best efforts to comply with this Privacy Statement as of the initial collection date of any of your personal information and only to make such changes that increase the protection of your personal information. In addition, if we make any material changes in our privacy practices that do not affect user data already stored in our database, we will notify you by email or post a prominent notice on the Client Area notifying users of the change. In some cases, when we post the notice, we will also email users who have opted to receive communications from us,

© 2011-2018 Strasmore, Inc. Effective May 25, 2018

Privacy Policy of Strasmore, Inc.

www.strasmore.com www.ssdnodes.com

legal@ssdnodes.com

Last Updated [5-25-2018]

notifying them of the changes in our privacy practices.

We may update this policy from time to time to describe how new site features affect our use of your data and to let you know of new control and preference features that we provide.