# OnLogic Privacy Policy

## Note: This Policy was last updated June 2, 2020.

This Privacy Policy applies to all data collected when purchasing products or services from, and using websites and content offered by OnLogic, Inc. or OnLogic B.V. (collectively referred to as "Services" and both entities hereinafter referred to as "OnLogic"), except as may be specifically noted. Unless otherwise noted in this policy or OnLogic's websites, or as otherwise agreed to specifically with a customer, OnLogic's products and services are generally provided by OnLogic, Inc. inside of the European Economic Area and by OnLogic B.V. inside of the United States and everywhere else. This Privacy Policy is available in English as well as in Dutch and German for your convenience. The English version shall be the controlling Privacy Policy document.

For U.S. users, by using the Services and providing information to us, you consent to the transfer and processing of the information in the United States and, unless otherwise stated in this Privacy Policy, we use this consent as the legal ground for that data transfer.

**IF YOU ARE LOCATED OUTSIDE OF THE UNITED STATES, PLEASE BE AWARE YOU ARE SENDING INFORMATION, INCLUDING PERSONAL DATA, TO THE U.S. WHERE OUR SERVERS ARE LOCATED. WHETHER YOU ARE LOCATED IN THE U.S., THE EUROPEAN ECONOMIC AREA OR ELSEWHERE, OUR COLLECTION, STORAGE AND USE OF YOUR PERSONAL DATA WILL AT ALL TIMES BE GOVERNED BY THIS PRIVACY POLICY. IN ORDER TO COMPLY WITH THE REQUIREMENTS OF THE EUROPEAN GENERAL DATA PROTECTION REGULATION (GDPR) FOR OUR EUROPEAN CONSUMERS AND USERS, THIS PRIVACY POLICY OUTLINES THE LEGAL BASIS ON WHICH WE PROCESS YOUR PERSONAL DATA AND PROVIDES OTHER INFORMATION REQUIRED BY THE GDPR.** Except where we may have a separate Legal Basis for Processing your Personal Data, when collecting Personal Data protected by the GDPR on the website, you will be prompted to provide your explicit consent to this data transfer and understanding of the terms set forth in this Privacy Policy.

**OUR COOKIE USE POLICY IS SET FORTH BELOW. TO IMMEDIATELY SKIP TO OUR COOKIE USE POLICY AND LEARN HOW TO VIEW, MANAGE OR CHANGE YOUR COOKIE SETTINGS, PLEASE CLICK HERE.**

OnLogic respects the privacy of its customers and visitors to its websites and use of the Services and all Personal Data collected and used is secured and accessed by authorized personnel only. We are continuously improving our security controls to protect your Personal Data against unauthorized or

unlawful processing and use, as well against any accidental loss, destruction, damage, theft or disclosure.

## Who We Are

We are OnLogic, Inc., OnLogic B.V., and any respective affiliates (collectively “OnLogic”), a global industrial PC company focused on hardware for the IoT edge, designing highly-configurable computers engineered for reliability. In addition to our www.onlogic.com website, we also host the I/O Hub, providing updates and insights from the IPC industry, hardware tutorials, tips and tricks and an inside look at emerging tech and the latest hardware. The collection, use and processing of any Personal Data from the I/O Hub or any other OnLogic controlled domain is covered by this Privacy Policy.

## Information About Your Personal Data

This Privacy Policy relates to data about you and your interaction with our Services. *"Personal Data" is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, email address, phone number, physical address information, device IDs, certain cookie and network identifiers, and the like.*

OnLogic collects, uses, discloses and processes Personal Data as outlined in this Privacy Policy, including to operate and improve the Services and our business, for advertising and marketing and to communicate with you about our products and services as further described in this Privacy Policy.

We may create de-identified or anonymous data from Personal Data by ***excluding*** data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you. Our use of anonymized and de-identified data is not subject to this Privacy Policy.

## Cookie Use

This Cookie Policy applies to all the products, services, websites and content offered by OnLogic and their affiliates (collectively “OnLogic” and “the websites” and/or the “Services”), except as may be specifically noted. OnLogic uses cookies, which are necessary to the websites’ functioning and required to achieve the purposes illustrated in this cookie policy.

All users visiting our websites from inside the European Union/EEA can view all the cookies used and change or withdraw your consent to the use of cookies made upon your initial visit to our website by visiting our Cookie Declaration page. European users are also encouraged to review our Interest Based Advertising section for additional information on the use of cookies, including controlling third-party cookies. All other users can visit the Cookie Declaration page to view all the cookies used and if you wish

to Opt-Out, modify or control third-party cookies, see our Interest Based Advertising or the Network Advertising Initiative's Opt-Out page.

## What are cookies?

For modern websites to work according to visitors' expectations, they need to collect certain basic information about visitors. To do this, a site will create small text files which are placed on visitor's devices – these files are known as cookies. Cookies are uniquely assigned to each visitor, and can only be read by a web server in the domain that issued the cookie to the visitor. Cookies cannot be used to run programs or deliver viruses to a visitor's device.

Cookies do various jobs which make the visitor's experience of the internet much smoother and more interactive. Cookies may collect both non-identifiable data as well as your Personal Data, depending on their specific function. For example, cookies are used to remember the visitor's preferences on sites they visit often, to remember language preference, to help navigate between pages more efficiently and to detect browsing patterns and improve the visitor experience.

To learn more about our use and classification of cookies, please visit our Cookie Declaration page.

# How We Collect and Use Personal Data

You may interact with us for a variety of purposes, including visiting and browsing our website(s), when you become a customer or when submitting an application for employment via our Careers page and our Applicant Tracking System. Click here for more information specific to our collection and use of your Personal Data for Recruitment and Hiring.

We collect your Personal Data in a number of ways and for various purposes, including:

1. *When you interact with our Services or create an online account:* We collect Personal Data when you use or interact with our Services, including when you create an online account with us, browse our products or services online, make purchases from us (including processing of payment), and when you ask us to custom configure products, customize apparel, products, or Services. We use this data to create your account, enable your activity within our Services, and to provide the services generally, including to develop, enhance, and improve our Services and your experience. We also use this data for internal purposes related to certain research, analytics, innovation, testing, monitoring, customer communication, risk management, and administrative purposes.

2. *When you communicate with us, apply or provide information via Careers, or sign up for promotional materials, newsletters, our blog (the I/O Hub):* We collect Personal Data when you communicate with us, sign up for promotional materials, newsletters, blogs, via email, regular mail, or online forms. We also collect and use your Personal Data for Recruitment and Hiring purposes. If you consent to such messages, we may use your Personal Data to communicate

with you about OnLogic Services, job openings, provide you with promotional messages and personalized advertising and for other marketing purposes. Please note that regardless of your email settings, we may send you notifications pertaining to the performance of our Services, such as revision of our Terms or this Privacy Policy or other formal communications relating to products or Services you have purchased or use. We may also use your Personal Data to respond to your requests or inquiries regarding technical support, online services, product information or to any other communication you initiate.

3. *When you engage with us via social media, comments in our blog or advertising:* We may collect your Personal Data when you engage with our online communities. This includes when you click on advertisements, interact with our social media pages, submit content, leave reviews, or otherwise enter information into comment fields, blogs, message boards, events, and other community forums sponsored by or affiliated with OnLogic. Please note that such forums may be public, so we recommend that you exercise care in deciding what information and content you wish to disclose.

4. *When we collect data from third parties or publicly-available sources:* We may obtain certain data about you from third party sources to help us provide and improve the Services and for marketing and advertising. We may combine your Personal Data with data we obtain from our Services, other users, or third parties to enhance your experience and improve the Services.

5. *When we leverage and/or collect cookies, device IDs, location and other tracking technologies:* We may collect certain Personal Data using cookies and other technologies such as web beacons, device IDs, advertising IDs, Flash cookies, and IP addresses. We specifically use browser cookies for different purposes, including cookies that are strictly necessary for functionality and cookies that are used for personalization, performance/analytics, and advertising. Our Cookie Use section contains more information and options to control or opt-out of certain data collection or uses.

6. *When we comply with Legal Requirements, Law Enforcement and for Public Safety Purposes:* We may use and store Personal Data in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms and Conditions of Sale, this Privacy Policy, or agreements with third parties, or for crime-prevention purposes.

## How We Disclose Personal Data

**Our disclosure is limited to situations where we are permitted to do so under applicable law, including within the European Economic Area and subject to national data protection laws and regulations.**

Subject to the above, we may disclose your Personal Data for the purposes as described in the prior section of this Privacy Policy and in the following ways:

1. *To Affiliates and Partners*: With companies or ventures that are owned or controlled by OnLogic and internally within OnLogic, as is necessary to provide and improve the Services, for marketing purposes, and for advertising.

2. *To Service Providers and Vendors:* With business partners, marketing partners, and vendors to provide, improve, and personalize the Services, including our ATS as described in Recruitment and Hiring.

3. *To Social Network Providers:* With social network providers when we use social network widgets, buttons, or plug-ins in our Services.

4. *For Advertising and Marketing:* With advertising and marketing partners for advertising and marketing purposes on OnLogic's behalf.

5. *For Certain Analytics and Improvement:* With certain companies for purposes of analytics and improvement of the Services.

6. *For Interest-Based Advertising:* With companies involved in interest-based advertising, including web, mobile app and other advertising. This advertising consists of OnLogic and third party ads that are personalized and may be displayed through various channels. Advertising also includes personalized ads from OnLogic displayed on third party sites and apps and through other channels. For more information on how data is disclosed for advertising see Interest-Based Advertising below.

7. *For Legal Compliance, Law Enforcement, and Public Safety Purposes:* With law enforcement, government or regulatory bodies, lawful authorities, or other authorized third parties in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms and Conditions of Sale, this Privacy Policy, or agreements with third parties, or for crime-prevention purposes.

# Recruitment and Hiring

If you use OnLogic's online careers page or website (referred to as "Careers"), we collect Personal Data as described in this Privacy Policy and which you submit to us through Careers, which we use for recruiting-related purposes. We use Cookies and other tools or technologies as described in this Privacy Policy and to provide you with a personalized online experience, to display and communicate relevant information about the culture, careers and opportunities at OnLogic, and to analyze the effectiveness of our recruitment efforts and resources. We may also use a Third Party Applicant Tracking System (referred to as "ATS") to process your Personal Data. When providing us with Personal Data through Careers or an ATS, you will be requested to provide your consent as required by applicable law. **For those in the European Economic Area, you will be requested for your explicit consent to process, use and transfer your Personal Data consistent with the rights, freedoms and requirements of the GDPR.**

1. *Who is collecting your personal data?* OnLogic is the Data Collector and will collect and use your Personal Data about you as described in this Privacy Policy and through Careers or an ATS and during the recruiting and hiring process. Your personal data may be retained and used by OnLogic for the purpose of considering your qualifications for employment, as required by law, or as otherwise described below.

2. *How We Collect Your Personal Data?* Subject to applicable labor and employment laws for the countries or applicable jurisdictions where roles are located, OnLogic may collect Personal Data via Careers, an ATS or from sources or as described further below:

    a. Personal Data provided by you during the application process including on résumés/CVs, letters, job application forms (whether provided through Careers or other means), writing samples, assessments, or other materials provided during the recruitment and application process.

    b. Personal Data generated by OnLogic employees, interviewers, contracted third parties or recruiters during the application process;

    c. We may collect publicly available Personal Data via online search engines, unsolicited referrals from third parties or through other legal and publicly available means.

    d. Personal Data disclosed through recommendations provided on your behalf by others;

    e. Personal Data, including as related to prior employment, education, and where applicable, credit history, criminal records or other data revealed during background screenings conducted by OnLogic or a contracted third party;

    f. Personal Data required or permissible to collect in order to comply with applicable law regarding equal employment, wage and hour, workplace safety, legally protected leave, workplace accommodation, labor relations or other rights, benefits or protections related to employment with OnLogic

By providing your Personal Data and other information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing inaccurate information may make you ineligible for employment. By providing us with your Personal Data, you consent to the processing, use and transfer of your Personal Data as set forth in this Privacy Policy. **For those in the European Economic Area, you will be prompted to provide your explicit consent for the collection, processing and use of your Personal Data consistent with the rights, freedoms and requirements of the GDPR.**

3. *How We Use Your Personal Data?* OnLogic uses your Personal Data as described in this Privacy Policy and to:

    a. Assess your suitability for employment, including current and future open positions.

    b. Perform administrative functions, assist with travel arrangements, process reimbursements for approved interview or other related expenses.

    c. Analyze our applicant pool, the effectiveness of Careers and make improvements to your experience in order to attract and retain top talent;

    d. Perform any legally-required reporting, respond to legal process, for the reasons set forth as a Legal Basis for Processing as related to your application and employment with OnLogic.

4. *Who Has Access to Your Personal Data?* In general, access to your Personal Data is restricted to authorized employees, contracted recruiters or other authorized third parties who have a legitimate need to know in order for OnLogic to evaluate your application for employment, perform functions supporting our Recruiting and Talent Management functions, or whom we are compelled to provide it to by applicable law.

5. *How long will OnLogic retain my Personal Data?* If you are given and accept an offer of employment by OnLogic, personal data collected during your pre-employment period will become part of your OnLogic personnel records, to be retained throughout and for a period after your employment with OnLogic. If Onlogic does not employ you, OnLogic may nevertheless continue to retain and use personal data collected during the recruitment process in order to consider you for new positions, to refer back to if you submit a subsequent application or other information to OnLogic again in the future, as well as for system administration and to continuously improve our recruitment processes and candidate experience. More specifics regarding our data retention practices are below.

6. *How OnLogic protects your Personal Data.* We implement, and maintain and are continuously improving appropriate technical, security and processes to data, network and IT system security measures to protect your data against unauthorized or unlawful processing and use, as well against any accidental loss, destruction, damage, theft or disclosure. All third-party service providers and partners, including for our ATS are subject to similar security requirements by contract and/or by local, state, national legal requirements, including the GDPR.

7. *Who do I contact with questions about the use of my Personal Data?* If you have a question, comment, or complaint, or wish to access a copy of your personal data or to correct it if you believe it is inaccurate, or request it to be deleted, you may Contact Us.

# Legal Basis for Processing

For the purposes of the GDPR and applicable data protection laws, OnLogic is the controller of the Personal Data you provide to us ("Data Controller"). As a Data Controller, we collect, use and process your Personal Data for a variety of purposes outlined in this Privacy Policy as well as in instances where you have provided OnLogic explicit consent to do so. In certain cases, separate consent is not required, including:

1. *For the performance of a contract:* To perform our contractual obligations to you, including account registration, fulfilling orders or purchases you have made, including payment processing, contacting you in relation to any issues with your order, in relation to the provision of the Services, where we collect data from third parties or publicly-available sources, or to aggregate and centralize data for the performance of the Services.

2. *To meet legal obligations:* To comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation as described above.

3. *For Legitimate Interests:* To operate our business and provide the Services, other than in performing our contractual obligations to you, for OnLogic's "legitimate interests" except where overridden by legal requirements, rights, and freedoms that require protection of Personal Data. For example, the following areas include processing covered by Legitimate Interests, subject to applicable law:

    a. *Communication:* To communicate with you regarding the Services, including to provide you important and necessary notices regarding changes to our Terms and Conditions of Sale or to address your requests, inquiries, and complaints. We may send strictly necessary or legally required communications, including emails, even if you have opted out of receiving other OnLogic emails or communications.

    b. *Respond to Your Requests:* To respond to your requests for technical support, online services, inquiries using our Chat function which is provided by a third party, product information or to any other communication you initiate. This includes accessing your account to address technical support requests.

    c. *OnLogicRecruiting and Hiring:* We may ask for your consent to use and process your Personal Data for recruitment and hiring purposes as set forth in this Privacy Policy.

    d. *Compliance with Law and Public Safety:* To assist in the investigation of suspected illegal or wrongful activity, including in-store tracking and sharing information with other entities for fraud, loss, and crime prevention purposes. To protect and defend our rights and property, or the rights or safety of third parties.

e. *Improvement and Development:* To develop, provide, enhance, and improve our Services and your experience, including to enable you to use the full range of our Services (e.g., processing of non-sensitive Personal Data when you access third party products and services; when we collect, use, or otherwise leverage cookies, device IDs, Location Data, data from the environment, and other tracking technologies; when you connect with us through social media; when we collect data from third parties or publicly-available sources; when we aggregate and centralize data). For internal purposes related to certain research, analytics, innovation, testing, monitoring, customer communication, risk management, and administrative purposes, including maintaining or updating contact and other information in a registered online account.

f. *Enforcing Terms and Notice:* To enforce our Terms and Conditions of Sale or this Privacy Policy, or agreements with third parties.

## Consent as a Basis for Processing

Generally, OnLogic will ask for your consent to process your Personal Data. You may indicate your consent in a number of ways, including, as permitted by law, ticking a box (or equivalent action) to indicate your consent when (i) providing us with your Personal Data through our Services or a form; or (ii) registering or creating an account with us. Due to different countries' laws governing consent for the collection and use of Personal Data, the requirements for consent may differ across regions. We may request your consent for a number of activities including:

1. *OnLogic Marketing and Communication:* We may ask for your consent to contact you by telephone, email or other means about offers, products, promotions, events or services we think may be of interest to you and for other marketing purposes.

2. *OnLogic Recruiting and Hiring:* We may ask for your consent to use and process your Personal Data for recruitment and hiring purposes as set forth above.

3. *Website Forms:* We may ask for your consent wherever you may be required or requested to provide Personal Data in order to complete a form as part of our Services, to access white papers, case studies or other technical, industry-related or other educational materials.

4. *To Connect with Us on Social Media or Enable Social Sharing:* We may ask for your consent when you connect with us through Social Media or to share your communications with others via Social Media as part of providing or promoting the Services.

5. *Advertising:* We use cookies and web beacons for purposes of interest-based advertising. More information on Interest Based Advertising and how to control your Personal Data is below.

# Interest Based Advertising

Interest-based advertising is advertising that is targeted to you based on a “online profile” created indirectly by your web browsing and over time and across websites or apps, including those of third parties. Our advertising practices also include the creation and use of "audience segments." You have the option to restrict the use of information for interest-based advertising and to opt-out of receiving interest-based ads. Depending on where you access our website from, you may also be asked to consent to our use of cookies, including advertising cookies. **All users may control or delete any type of cookie or manage your data privacy by viewing and modifying your browser settings and/or deleting cookies from your browser history. These settings vary based on your browser.** Additional information on Audience Segments, interest- based advertising and how to opt-out is found below.

1. *Audience Segments:* We disclose various types of information for purposes of interest-based advertising, including for third party, interest-based advertising. This processing includes the use of Personal Data to create de-identified audience segments. These audience segments are then made available for interest-based advertising, including for third party advertising, on OnLogic online properties. The audience segments are based on your “online profile” of website visits, online and offline purchasing behaviors, interaction with our ads or marketing emails, similar types of information, and in some cases, data from third parties. The segments, prior to being used, are de-identified so that they will not identify you personally. In some instances, we may use a third party to match de-identified segments to targeting IDs that are then used on third party sites.

2. *Interest-Based Advertising Opt Outs, Choices, and Control:* For all of the interest-based advertising described above, including segments, you have the choice to not have your data used to target and serve you interest-based advertising-including third party advertising-regardless of where such ads might be served. These opt-outs require that strictly necessary cookies are not blocked by the settings in your web browser. You may use a number of tools, sites and other resources to identify how your Personal Data is being used for interest-based advertising and opt-out in order to control the use and processing of your data. For general information and resources, these include Digital Advertising Alliance (US), Canadian Digital Advertising Alliance (Canada), European Digital Advertising Alliance (EU). If you live in the United States, Canada, or the European Union, you can visit the following sites/Opt-out tools to find a convenient place to opt-out of interest-based advertising with participating entities for each region: Ad Choices (US), Your Ad Choices(Canada), or Your Online Choices (EU). You may also opt out of third party vendors’ use of cookies by visiting the Network Advertising Initiative opt-out page. Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Preferences Manager.

These websites also provide detailed information about how interest-based advertising works. Opting out does not mean that you will no longer receive advertising from us, or when you use the Internet. It just

means that the data collected from our websites will not be used for interest-based advertising and that the advertising you see displayed on websites will not be customized to your interests.

## Transfers of Your Personal Data to Other Countries

The Personal Data OnLogic processes, and all associated Services and systems is housed on servers in the United States. If you are located outside of the United States, please be aware that Personal Data we collect will be processed and stored in the United States. The data protection and privacy laws in the United States may offer a lower level of protections than in your country/region. For those in the European Economic Area, your Personal Data will be used and processed in accordance with this Privacy Policy and subject to the rights, freedoms and responsibilities covered by the GDPR.

By using our Services and submitting your Personal Data, you agree to the transfer, storage, and/or processing of your Personal Data in the United States. Where and as required, we will seek your explicit consent as outlined in this Privacy Policy.

## Data Retention

We will retain your Personal Data for as long as you maintain an account or as otherwise necessary to provide you the Services. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Except where otherwise required or allowed by this Privacy Policy, or subject to a valid and permissible agreement with a third party, our general Data Retention practices are as follows:

| Personal Data Type | Live Retention | Archive Retention | Exceptions* |
|---|---|---|---|
| Employment candidates | 1 year from application | N/A | Subject to applicable local legal req. or permissions |
| Employees | During Employment | Post-Employment:<br>2 years: All Data<br>5 years: EEO & Tax-related Data<br>7 years: Pension/Benefits-related Data | Subject to applicable local legal req. or permissions |
| Customers PII | 2 years since last purchase | 5 years after expiration of live retention date | Order history<br>Tax related information |
| Partners / Providers | 2 years since last transaction | 5 years after expiration of live retention date | Order history<br>Tax related information<br>SIEM related information |

* Given various legal and regulatory requirements and changes in labor, employment, wage and hour, tax, data privacy and consumer protection laws, this table is only intended to provide a general summary of data retention practices. If you have any questions or wish to know more specific information about our data retention, please Contact Us.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete your Personal Data from our systems per the above table. We will also delete your Personal Data upon your request, subject to the above table or other legal basis for retaining and processing data. If you have a question, comment, or complaint, or wish to access a copy of your personal data or to correct it if you believe it is inaccurate, or request it to be deleted, you may Contact Us.

## Security

We implement appropriate technical and organizational safeguards to protect against unauthorized or unlawful processing of Personal Data and against accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to Personal Data. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of Personal Data.

*Links to Other Websites:* Please note that this Privacy Policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. Our Services may provide a link or otherwise provide access to Third Party Sites. We provide these links merely for your convenience. We have no control over, do not review, and are not responsible for Third Party Sites, their content, or any goods or services available through the Third Party Sites. Our Privacy Policy does not apply to Third Party Sites, and any data you provide to Third Party Sites, you provide at your own risk. We encourage you to review the privacy policies of any Third Party Sites with that you interact with.

## Children

We do not knowingly collect Personal Data online from children under 13 (note that the minimum age may vary based on country/region, and on local law). If you become aware that a child has provided us with Personal Data without parental consent, please contact us through our Support Team. If we become aware that a child under 13 has provided us with Personal Data without parental consent, we will take steps to remove the data and cancel the child's account.

## How to Contact Us

If you have any questions, comments, or concerns about how we handle your Personal Data, then you may contact us at:

**Email:** privacy@onlogic.com

**Regular Mail:**

OnLogic, Inc.
Attention: Privacy Office
35 Thompson Street
South Burlington, VT 05403
privacy@onlogic.com

OnLogic B.V.
Attention: Privacy Office
Handelskade 49,
2288 BA  Rijswijk,
The Netherlands
privacy@onlogic.com