

CENTRIC SOFTWARE PRIVACY POLICY

Last Updated: September 2021

Centric Software, Inc., a Delaware corporation, and its subsidiaries or affiliates (“**Company**”, “**we**,” or “**us**”) respects the privacy of individuals who visit the Company’s web sites, our customers, and individuals who register to attend the Company’s corporate events, access certain restricted content on our Website or apply for employment or other engagement with us. By using our www.CentricSoftware.com website, any other webpages which we operate, and software, web-based applications that use cookies or App(s) (collectively the “Website”), by applying for employment with us, whether directly or via a recruitment agency, or where we post a direct link to this privacy policy (“**Policy**”), you consent to the collection, use, and disclosure of personal information in accordance with this Policy. This Policy describes our use and disclosure of the personal information we collect. If you do not agree with the terms set out herein, please do not use this Website or otherwise provide us with Personal Information.

1. Personal Information

- 1.1. “**Personal Information**”, as used in this Policy, means any information relating to an identified or identifiable person. An identifiable person is a person who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person.
- 1.2. By way of example, and not intended to be an exhaustive list, we may collect the following Personal Information: First and last name; Title; Email address; Postal address; Telephone number(s); industry and industry sub-industry sectors; type of organization (company, school, university, etc.), organization name, organization size, department; people to whom purchases are shipped, employer information; information provided in the course of applying for employment with us (which may vary according to local employment law) such as, education history and employment history and where applicable and permitted by local laws information from references, evaluation reports and background checks; IP and/or MAC address; Cookies (as described in section 2.2 - *Passive Information Collection*); and any other Personal Information as may be relevant for the uses identified in Section 3 below.
- 1.3. Personal Information does not include “aggregate” or other non-personally identifiable information. Aggregate information is information that we collect about a group or category of products, services, or users that is not personally identifiable or from which individual identities are removed. We may use and disclose aggregate information, and other non-personally identifiable information, for various purposes.

2. Collection of Personal Information

2.1. Collection of voluntarily-provided Information

We collect Personal Information that our users provide to us in a variety of ways. These include the following:

- Subscribing to Email Newsletters
- Registering for events (including, without limitation, seminars, webinars)
- Requesting information about our products and services
- Requesting technical support
- Correspondence. If you contact us by e-mail, using a contact form on the Website, or by mail, fax, or other means, we collect the Personal Information contained within, and associated with, your correspondence
- Applying for a job either in person, via LinkedIn and similar websites, or via a recruitment agency
- Personal information collected online may be supplemented with information you provide to Centric Software through other Centric Software services, as well as other sources such as trade shows or seminars, and other data appending methods such as spot tags, tracking and cookies as referenced below.

2.2. Passive Information Collection

When you visit our Website, some information is collected automatically. For example, we automatically collect your browser's Internet Protocol (IP) address, your browser type, the type of device from which you are visiting the Website (e.g., a personal computer or a mobile device), the identifier for any handheld or mobile device that you may be using, the actions you take on our Website. We also may collect information regarding your interaction with e-mail messages, such as whether you opened, clicked on, or forwarded a message.

We may collect this information passively using technologies such as standard server logs, cookies, and clear GIFs (also known as "Web beacons"). We only collect data using cookies and clear GIFs where you have consented to their use. Cookies are identifiers that can be sent from a site via your browser to be placed on your computer's hard drive. Thereafter when you visit a site, a message is sent back to the web server by the browser accessing the site. You can also control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Website. We use passively-collected information to administer, operate, and improve the Website, to improve the effectiveness of advertising, and to provide advertisements and other content that is tailored to you. If we link or associate any information gathered through passive means with Personal Information, or if applicable laws require us to treat any information gathered through passive means as Personal Information, we treat the combined information as Personal Information under this Policy. Otherwise, we use and disclose information collected by passive means in aggregate form or otherwise in a non-personally identifiable form.

For further details on our use of cookies and other similar technologies, please click [here](#) for our cookie policy.

2.3. Information from Other Sources

We may receive information about you, including Personal Information, from third parties and may combine this information with other Personal Information we maintain about you. If we do so, this Policy governs any combined information that we maintain in personally identifiable format.

3. Why we Process your Personal Information

We will process your Personal Information for one or several of the following purposes:

3.1. With your Consent

- To communicate with you, including when you request information related to Centric Software products and services
- To ascertain your requirements and interests and provide you with the most suitable products and/or services;
- To provide you with a personalized, interactive use of Centric Software Websites and allow you to access all their features;
- To process your application to us for employment; and
- For any other purposes that we may disclose to you at the point at which we request your Personal Information, and pursuant to your consent.

3.2. To provide you with Centric Software products or services

- To enable you to: register for an event, seminar, webinar, enter a contest or create a user profile
- To enable Centric Software to manage its business relationships with you, (including sales opportunities, commercial offers, purchasing, contracts, orders, invoices, emails, and voice messaging data, delivery of Centric Software products, support or professional services);
- To manage your training and/or certification on Centric Software products and services.
- If you attend an event organized by Centric Software, you may be asked for health information for the purpose of identifying and being considerate of individuals who have disabilities, special dietary requirements as well as other additional Personal Information that are necessary to be processed throughout the event.

3.3. To comply with the following legitimate interests:

Centric Software takes into consideration and balances any potential impact on you and your rights before processing your Personal Information for legitimate interest purposes.

- To improve your experience and to remember your settings;
- To provide you with information related to marketing activities for similar goods and products if you are already using Centric Software products and services;
- To enable Centric Software to manage its business relationships when you are acting on behalf of a Centric Software prospect or customer (including sales opportunities, commercial offers, purchasing, contracts, orders, invoices, which may include conversational data triggered via chat functionalities on Centric Software Websites, contact forms, emails, and voice messaging data, deliver of Centric Software products, support or professional services);
- To create anonymous data for analytics and for compliance, fraud prevention and safety; and
- Following your application for employment with us, to communicate additional employment vacancies that we think may be of interest you.

3.4. *To comply with law*

To manage Centric Software legal obligations related to applicable export laws, trade sanctions and embargoes issued by the European Union and its member states, of the United States of America and other countries, if applicable. This may include conducting and managing automated checks of any user registration data identified in this Policy and other information you provide about your identity against applicable sanctioned-party lists.

4. Recipients of Personal Information

Except as described in this Policy, we will not disclose your Personal Information that we collect to third parties without your consent. We may disclose information to third parties if you consent to us doing so, as well as in the following circumstances:

- **Service Providers**

We may disclose Personal Information to third parties acting on our behalf: we may share your Personal Information with third party vendors, consultants and other service providers that we employ to perform tasks on our behalf such as hosting services and technical support (provided for our customers' benefit), event venues, marketing companies, recruitment agencies and other third parties providing services for other operational requirements.

Where you transmit data to us via email, your enquiry is stored and processed as an email which is hosted by Microsoft. It may also be logged on a CRM system, Salesforce.com, Jira, Confluence or other systems that support our business requirements. Our Website is hosted by a third-party provider who would also receive your data. Any data you enter into our Website is stored in our CRM system.

- **Centric Software Affiliates**

Centric Software may share Personal Information with other companies in order to work with them, including affiliates of the Centric Software corporate group. For example, Centric Software may need to share Personal Information with other companies within the Centric Software corporate family for customer support, marketing, as part of the employment application process, technical operations and account management purposes.

- **Business Transfers**

Information about our users, including Personal Information, may be disclosed and otherwise transferred to an acquirer, or successor or assignee as part of any merger, acquisition, debt financing, sale of company assets, or similar transaction, as well as in the event of an insolvency, bankruptcy, or receivership in which Personal Information is transferred to one or more third parties as one of our business assets.

- **For Legal Reasons**

We also disclose Personal Information if we believe that doing so is legally required, or is in our interest to protect our property or other legal rights (including, but not limited to, enforcement of our agreements), or the rights or property of others, or otherwise to help protect the safety or security of our

Website and other users of the Website.

5. Your Rights

If you receive a marketing e-mail or other communication from us, you may unsubscribe at any time by following the instructions contained within the e-mail or other communication. Please be aware that if you opt-out of receiving marketing communications from us, it may take up to ten business days for us to process your opt-out request, and you may receive marketing communications from us during that period.

You have a right to access your Personal Information. In addition, you have a right to request the rectification, completion, update or erasure of your Personal Information. You have a right to restrict processing. You also have a right to obtain a copy of your Personal Information stored by us. You have a right to object, in relation to specific processing of your Personal Information. Additionally, you may also have a right to transfer your Personal Information to another service provider.

You may exercise your rights by submitting your request to the contact details in [section 13](#).

6. Personal Information Retention Period

We do not store your Personal Information for any longer that is necessary for the purposes for which we collected it. Retention periods may vary depending on the data categories and the processing activities.

Where we are processing and using your Personal Information as permitted by law or under your consent, we will store it: (i) only as long as required to fulfill the purposes set out above, (ii) where we have a legitimate interest in using the Personal Information, until you object to our use of the Personal Information, or (iii) where you gave you consent, until you withdraw it. However, where we are required by applicable law to retain the Personal Information longer or where the Personal Information is required to assert or defend against legal claims, we will retain it until the end of the relevant retention period or until the claims in question have been settled.

In sending us your resume or CV, you are allowing us to store it with your contact details in our job applicant database. We will only share your personal details with our HR team members, talent acquisition, third-party facilitators and consultants engaged to support the recruitment process, and our interview panel members for positions that you have applied for or that may be of interest to you for a profile like yours.

We will not keep your Personal Information in our candidate database for more than 12 months after the end of your hiring process (that is to say after the last call, interview, meeting or email that we have had / exchanged with you during the interview process), unless either we are required to keep such information longer by law or we have written agreement via email from you.

7. Customer Data

Centric Software customers may electronically submit data or information which may include Personal Information into the Centric Software products ("**Customer Data**"). Centric Software will only have access to such Customer Data in the event the customer also has engaged Centric Software to provide related services, which may include, but not be limited to, hosting, maintenance and support, or managed services ("**Services**"). Where Centric Software has such access, it will not review, share, distribute, or reference any such Customer Data except as provided in the applicable agreement between Customer and Centric Software, and/or Data Processing Agreement (the "**Agreement**"), or as may be required by law. In accordance with the Agreement, Centric Software may access Customer Data only for the purpose of providing the Services or preventing or addressing service or technical problems or as may be required by law.

Centric Software acknowledges that you have the right to access your Personal Information. If Personal Information pertaining to you as an individual has been submitted to us by a Centric Software customer and you wish to exercise any rights you may have to access, correct, amend, or delete such data, please inquire with our customer directly. Because Centric Software personnel have limited ability to access data our

customers submit to our Services, if you wish to make your request directly to Centric Software, please provide the name of the Centric Software customer who submitted your data to our Services. We will refer your request to that customer and will support them as needed in responding to your request within a reasonable timeframe.

8. Links to Websites not controlled by Centric Software or its Subsidiaries

The Website may contain links to other web sites (“Third-Party Sites”), products, or services that we do not own or operate. If you choose to visit or use any Third-Party Sites or products or services available on or through such Third-Party Sites, please be aware that this Policy will not apply to your activities or any information you disclose while using those Third-Party Sites or any products or services available on or through such Third-Party Sites. We are not responsible for the privacy practices of these Third-Party Sites or any products or services on or through them.

9. Protection of Personal Information concerning children

Our products and services are not designed to be marketed to or used by children who are considered as minors under applicable data protection laws and we do not knowingly collect or store Personal Information from children (as defined by the applicable laws).

If parents or guardians become aware that their child has provided us with Personal Information without their consent or without a teacher’s or school administrator’s consent, they can ask us to remove such Personal Information and terminate the child’s account by contacting us as set out in [section 13](#).

If we become aware that we have collected Personal Information from a child below the age of consent under local data protection laws without consent from a parent or guardian, we will take steps to seek the parent’s or guardian’s consent for that processing or to remove such Personal Information and terminate the child’s account.

10. International Visitors - Where we store your Personal Information

If you choose to use the Website or otherwise provide us with your Personal Information from outside the U.S., then you should know that you are transferring your Personal Information outside of your region and into the U.S. for storage and processing. By providing your Personal Information to us through your use of the Website, you agree to that transfer, storage, and processing in the U.S. Also, we may transfer your data from the U.S. to other countries or regions in connection with storage and processing of data, fulfilling your requests, centralized corporate group functions and operating the Website.

With respect to Personal Information transferred from Europe to the United States or other non-European locations, please note that our subsidiaries who have received Personal Information relating to applicants in Europe offer “an adequate level of protection” in accordance with European legislation.

Before sharing Personal Information concerning a resident in the European Economic Area (EEA) or United Kingdom (UK) (together “Europe”) with a third party, we will ascertain that the third party: (i) safeguards Personal Information consistent with this Policy for example by entering into appropriate agreements, and/or if required standard contractual clauses for the transfer of data as approved by the European Commission; and (ii) is subject to the relevant data privacy legislation in Europe or offers “an adequate level of protection” in accordance with said legislation.

11. Security

We use reasonable security measures that are designed to protect Personal Information from accidental loss, disclosure, misuse, unauthorised access, alteration and destruction. Please be aware, however, that whilst we strive to protect your Personal Information, no data security measures can be guaranteed to be completely effective and use of the internet will always be subject to the risk of a security breach. Consequently, we cannot ensure or warrant the security of any Personal Information that you provide to us and transmission is

at your own risk.

It is important for you to exercise caution to prevent unauthorized access to your Personal Information. You are responsible for the confidentiality of your password and information appearing on your account. Consequently, you must ensure that you log out of your session in the event of shared use of a computer. If you believe that the security of your Personal Information has been compromised or may be at risk then please use the contact information in [section 13](#) to let us know.

12. Your Right to Complain

We are committed to ensuring the privacy of Personal Information. You can contact our data protection representative by using the contact details in [section 13](#) if:

- you have any questions about this Privacy Policy;
- you encounter any issue when having access to your Personal Information or related to your rights as described above;
- you believe that we are not complying with the GDPR or the applicable local data protection laws; and
- you have a reason to believe that the security of your Personal Information has been compromised or misused.

When you want to report a claim by lodging a complaint to our data protection representative you will need to contact us using the contact details in [section 13](#).

While we prefer you contact us directly to enable us to promptly address your concerns, you have the legal right to contact the local supervisory authority in your country to lodge a complaint. If you are a European resident details can be found [here](#). Non-European Union residents should follow local procedures for dispute resolution.

13. Contacting Us

If you have any questions or comments about this Policy, please complete this [form](#) (selecting “Exercising your rights related to your Personal Information” from the drop down menu) to contact our Data Protection Officer or write or email us at

Centric Software, Inc.
Attn: Data Protection Officer
655 Campbell Technology Pkwy, Suite 200
Campbell CA 95008
USA

privacy@centricsoftware.com

14. Updates to this Policy

We may occasionally update this Policy. When we do, we will also revise the “last updated” date at the beginning of the Policy. Your continued use of our Website after such changes will be subject to the then-current policy. We encourage you to periodically review this Policy to stay informed about how we collect, use, and disclose personal information.

15. Additional Privacy Notices for other geographies

Depending on where you are a resident, some additional terms as detailed below may be applicable to you. Where the Privacy Policy refers to “Personal Information”, it shall be interpreted, as applicable, to mean “personal information” as defined by the applicable data protection law depending on your place of residence.

15.1. AUSTRALIA - PRIVACY NOTICE FOR PERSONAL INFORMATION GOVERNED BY THE AUSTRALIAN LAW

All payments made in connection with our Website are processed through a third party payment service provider to which we or you provide necessary Personal Information to enable you to purchase our products or services. These payment service providers may share your Personal Information with other services providers (such as verification service, web posting, data analytics) to perform the services in connection with completing a transaction including the processing of payments. We authorize such payment service provider and related service providers to use and disclose your Personal Information as long as necessary to perform the foregoing services provided they comply with legal requirements.

With regard to your rights or any concern you may have related to your Personal Information, you may contact our Data Protection Officer by filling in this [form](#) (selecting “Exercising your rights related to your Personal Information” from the drop down menu) or contacting:

Centric Software, Inc.
Attn: Data Protection Officer
655 Campbell Technology Pkwy, Suite 200
Campbell CA 95008
USA

privacy@centricsoftware.com

15.2. CHINA - PRIVACY NOTICE FOR PERSONAL INFORMATION GOVERNED BY THE PEOPLE’S REPUBLIC OF CHINA LAW

We may collect the following categories of Personal Information under the circumstances as below:

- **Registration:** If you register through our Website and we will collect your personal and business contact information
- **Purchase of our products and services:** Transaction information details related to your purchases may be collected by us to perform the deal
- **Use of our products or services:** When you request for or use our products or services, we will collect your profile information and other specific information depending on the needs of such products or services to be provided by us
- **Feedback:** You may submit feedback in a survey or interact with us through our Website, where we may collect such information from you
- **Cookies:** we will collect your operation and usage data through cookies when you visit our Website in particular in order to improve our service to make it more user-friendly.

Sensitive Personal Information

Sensitive Personal Information means Personal Information the divulgence, illegal provision or misuse of which may endanger the bodily or property safety or may result in damage to personal reputation or bodily or mental injury or discrimination, which may be composed of information concerning race, religion, political position, personal property, personal health and physiological information, personal identity and network identifier information. In this Policy, personal sensitive information collected or processed are summarized as below for your attention.

- Financial Personal Information (credit card number and expiry date, name and address of the cardholder);
- Conversational information triggered via chat functionalities on our Website (contact forms, emails, and voice messaging data);
- Health information (for the sole purpose of identifying and being considerate of individuals who have disabilities or special dietary requirements throughout events to which you attend).

Marketing Communications

If you accept to receive marketing communications and other relevant information from us, we will send you this commercial information, as well as recommendation of contents that you may be interested in via SMS, email or phone. You can unsubscribe from receiving such marketing materials with the help of customer service, or through the instructions in the SMS and email.

International Data Transfers

Your Personal Information will be stored on servers in China and the United States of America. As part of a worldwide multi-tiered organization, we may share your Personal Information outside China, for example, with our other company affiliates and with our suppliers or business partners, to support the products and services provided to

you or the organization you are working for. We will comply with the Chinese Regulations for such transfer, including taking reasonable steps to safeguard the privacy of your Personal Information in accordance with the Chinese Regulations.

What Are Your Rights And Choices

- Withdraw your consent: certain basic Personal Information may be required by us to provide you with products or services. For Personal Information, which is not necessary, you may withdraw your consent at any time.
- Delete your account: You may ask for the deletion of your account at any time, and we will process your request as soon as practicable after verifying your identity and related authorization.
- File a complaint: You can address a request to us if you have any concern related to the processing of your Personal Information.

With regard to your rights as mentioned above, you may contact our Data Protection Officer by completing this [form](#) (selecting “Exercising your rights related to your Personal Information” from the drop down menu) or by writing to or emailing us at:

Attn: Data Protection Officer
Centric Software (Shanghai) Limited
Suite 3218, Level 32, 161 Lujiazui(E) Road
Pudong Shanghai, China 200120
privacy@centricsoftware.com

15.3. JAPAN - PRIVACY NOTICE FOR PERSONAL INFORMATION GOVERNED BY JAPANESE LAW

Where the Policy refers to “Personal Information” it shall be interpreted to mean “Personal Information” as defined in Act on Protection of Personal Information of Japan (“APPI”) but only for Personal Information subject to APPI.

Additional Information Related To Your Personal Information Processed By us

The following Centric Software companies will process your Personal Information for the purposes listed in this Policy:

Centric Software , Inc.
655 Campbell Technology Pkwy, Ste 200
Campbell CA 95008 USA

In addition, this Personal Information may be shared with our affiliates and third parties that are contributing to the performance of one or several purposes listed in the Policy.

Your Rights

With regard to your rights to request disclosure of purpose of use, correction, addition, deletion, suspension of use/erasure, stop of third party provision regarding Personal Information held, you may contact our Data Protection Officer by completing this [form](#) (selecting “Exercising your rights related to your Personal Information” from the drop down menu) or by writing to or emailing us at

Centric Software
Attn: Data Protection Officer
Level 11 Aoyama Palacio Tower
3-6-7 Kita-Aoyama, Minato-ku
Tokyo 107-0061, Japan
privacy@centricsoftware.com

15.4. RUSSIA - PRIVACY NOTICE FOR PERSONAL INFORMATION GOVERNED BY RUSSIAN LAW

Processing and Sharing of Your Personal Information

We are the operator (as defined in Federal Law No. 152-FZ “On Personal Information” of 27 July 2006) of your Personal Information under this Policy.

You hereby expressly consent to us instructing third parties listed in this Policy to process your Personal Information for the purposes provided for in this Policy. We will be responsible for the processing of your Personal Information

by such third parties.

Processing of Health Information

If you attend an event organized by us, and you are asked for health information for the purpose of identifying and being considerate of individuals who have disabilities, special dietary requirements, we will only process such health information upon your separate consent in a written form.

International Data Transfers and Localization of Personal Information

If you are a Russian Federation resident, we will provide recording, systematization, accumulation, storage, adjustment (update, modification), and extraction of your Personal Information with the use of databases located in the territory of the Russian Federation. We may transfer your Personal Information to another country and subsequently store your Personal Information on additional databases. We may also transfer your Personal Information to a country that, under the applicable data protection laws, does not provide for the adequate level of protection of data subject's rights. You hereby expressly consent to such transfer for the purposes of performing our obligations under this Policy.

What Are Your Rights

With regard to your rights or any concern you may have related to your Personal Information, you may contact by completing this [form](#) (selecting "Exercising your rights related to your Personal Information" from the drop down menu) or by writing to or emailing us at:

Centric Software, Inc.
Attn: Data Protection Officer
655 Campbell Technology Pkwy, Suite 200
Campbell CA 95008
USA

privacy@centricsoftware.com

15.5. USA - PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Under the California Consumer Privacy Act ("CCPA") applicable to California residents, you are entitled to benefit from the following additional provisions regarding your Personal Information.

What are the Categories of Personal Information Collected

The categories of Personal Information we collect about California residents are identifiers (e.g. name, address, email, phone number, job title, and transactional information), and internet or other electronic network activity information (e.g. usage information, IP and MAC address, cookie information, and customer feedback).

What Are Your Rights And Choices

You have the right to request that we disclose to you certain information about our collection and use of your Personal Information over the past 12 months. That information includes:

- The categories of Personal Information we collected about you;
- The categories of sources from which we collected your Personal Information;
- Our business or commercial purpose for collecting, or sharing your Personal Information;
- The categories of third parties with whom we share your Personal Information, if any;
- A copy of your Personal Information and a list of recipients, as applicable.

To exercise the rights described in the Policy you may contact us using the details provided at the end of this section.

Only you, or a person, or a business entity registered with the California Secretary of State to conduct business in California that you authorize to act on your behalf, may make a request related to your Personal Information. The request must provide enough information to allow us to 1) reasonably verify you are the person about whom we collected Personal Information or an authorized representative and 2) enable us to properly understand, evaluate, and respond to it. Making such a request does not require you to create an account with us. We will only use Personal Information provided in a request to verify the requestor's identity or authority to make the request.

Non-Discrimination

We will not discriminate against you (for example by denying you products or services, charging you a higher price or giving you a different level or quality of service) for exercising any of your CCPA rights.

Contact Information

If you have any questions or comments about this Policy, the ways in which we collect and process your Personal Information, your privacy choices and rights under California law or wish to exercise your privacy rights, please do not hesitate to contact us by completing this [form](#) (selecting “Exercising your rights related to your Personal Information” from the drop down menu) or by writing to or emailing us at:

Centric Software, Inc.
Attn: Data Protection Officer
655 Campbell Technology Pkwy, Suite 200
Campbell CA 95008 USA

privacy@centricsoftware.com