



General Privacy Statement

Last updated: 22 May 2020

Neeco Industries, Inc. and its affiliates (collectively, “**NEECO** “we”, “our”, and “us”) have a long-standing commitment to safeguard the privacy of information entrusted to us and value the trust of our existing and prospective business relations, which include Neeco’s business customers, investors, business partners, resellers, suppliers and other relevant stakeholders. The privacy principles and procedures set forth below are intended to tell you how we collect, use, and distribute your information.

Collection and Use of Personal Information

We may process personal information that identifies you as an individual or that relates to an identifiable person (“**Personal Information**”) such as:

- Personal Details and Contact Information: Name; address; e-mail; telephone and fax details and other contact information; nationality; photograph, voice recordings and video; signature and electronic signature; CVs received from vendors/subcontractor specialists for projects;
- Professional Affiliations: Business name, title, and address;
- Financial Information: Payment card number; bank account number and account details; tax returns; salary; assets and income; personal bankruptcy; credit history and credit score;
- Marketing Preferences and Customer Service Interactions: Marketing preferences; entry in contests or promotions; responses to voluntary surveys; recordings of telephone calls with customer service and other representatives;
- Operational Data: Transactions, sales, purchases, uses, supplier information, credentials to online services and platforms, and electronic content produced by data subjects using company systems, including online interactive and voice communications, such as blog, chat, webcam use and network sessions;
- Learning history, when you participate in online learning programs: Progress dashboards, course, enrollment, and feedback reports;
- Any further information required for credit verification, compliance/ethics checks, or customer due diligence;
- Internal identifiers, to be able to process your Personal Information across our internal systems.

We may collect Personal Information in various ways, such as: when you interact with one of our websites; when you enter into a transaction or contractual arrangement with us; when you participate in our programs or activities; when you provide data at industry events and trade shows; when you visit our facilities or we visit you at your offices; when you contact our customers services; or in connection with your inquiries and communications with us. We may also collect Personal Information from other sources, including your employer, data companies, publicly-accessible databases, and joint marketing partners. Additionally, Neeco may automatically collect or process Personal Information (such as your Internet domain or IP address) as part of the operation of the services or during the course of your activities on or use of the websites.

We and our service providers use Personal Information for legitimate business purposes including:

- **Providing the functionality of the services and fulfilling your requests.**

- To respond to your inquiries and fulfill your requests, when you contact us via one of our online contact forms or otherwise, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for or other information about our services.
- To conclude and execute agreements with customers, suppliers and business partners, including required screening activities (e.g. for access to our premises or systems, or credit verification, compliance/ethics checks or customer due diligence).
- To complete your transactions, and provide you with related customer service.
- To send administrative information to you, such as changes to our terms, conditions and policies.
- To allow you to send messages to another person if you choose to do so.

We will engage in these activities where we have a legitimate interest, to manage our contractual relationship with you, and/or to comply with a legal obligation.

- **Providing you with our newsletter and/or other marketing materials.**

- To send you marketing related emails, with information about our services, new products and other news about Neeco.

We will engage in this activity with your consent or where we have a legitimate interest.

- **Analysis of Personal Information for business reporting and providing personalized services.**
 - To analyze or predict our users' preferences in order to prepare aggregated trend reports on how our digital content is used, so we can improve our services.
 - To better understand you, so that we can personalize our interactions with you and provide you with information and/or offers tailored to your interests.
 - To better understand your preferences so that we can deliver content via our services that we believe will be relevant and interesting to you.

We will provide personalized services either with your consent or because we have a legitimate interest.

- **Allowing you to participate in sweepstakes, contests or other promotions.**
 - We may offer you the opportunity to participate in a sweepstakes, contest or other promotion.
 - Some of these promotions have additional rules containing information about how we will use and disclose your Personal Information.

We use this information to manage our contractual relationship with you.

- **Aggregating and/or anonymizing Personal Information.**
 - We may aggregate and/or anonymize Personal Information so that it will no longer be considered Personal Information. We do so to generate other data for our use, which we may use and disclose for any purpose.

We engage in these activities because we have a legitimate interest.

- **Accomplishing our business purposes.**
 - For data analysis, for example, to improve the efficiency of our services;
 - For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements;
 - For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft;

- For developing new products and services;
- For enhancing, improving, or modifying our current products and services;
- For identifying usage trends, for example, understanding which parts of our services are of most interest to users;
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users; and
- For operating and expanding our business activities, for example, understanding which parts of our

services are of most interest to our users so we can focus our energies on meeting our users' interests. We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest.

We may share your Personal Information with our affiliates for the purposes described in this Privacy Statement.

How Personal Information is shared with third parties

Neeco may disclose Personal Information to third parties assisting us in carrying out a transaction or providing services for you (such as packaging, sending and delivering purchases and information to you, clearing credit card transactions, or performing statistical analyses of our services). We may also disclose your Personal Information to our third party service providers who provide services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing and other services.

Other than with your consent, Neeco will not sell, trade, or disclose your Personal Information to third parties that want to market products to you.

Other uses and disclosures

Neeco may use or disclose Personal Information as we believe to be necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions or in response to activities that are unlawful or a violation of Neeco rules for use of the Website; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain. In addition, we have a legitimate interest to use, disclose or

transfer your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

Sensitive Information

We do not knowingly collect sensitive Personal Information (such as, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) from you via the services. We also ask that you not send us, and you not disclose to us, any sensitive Personal Information on or through the services or otherwise. Where we collect information that itself does not qualify as sensitive Personal Information, but from which potentially sensitive inferences could be made (such as when you provide to us any dietary requirements when attending one of our conferences or events), we only use such information for the limited and non-sensitive purpose for which you made such information available to us. We do not use such information to make any kind of sensitive inferences.

Other information we may collect, including 'cookies'

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you that does not reveal your specific identity,
- Information that has been aggregated in a manner that it no longer reveals your specific identity

Collection of Other Information

We and our service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the services

(such as the app) you are using. We use this information to ensure that the services function properly.

- **Use of cookies:** We may use "cookies" in connection with operation of its websites. Cookies are small pieces of information that are stored on your computer by the Neeco Website server.

Uses and Disclosures of Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Privacy Statement.

In some instances, we may combine Other Information with Personal Information (such as combining your name with your geographical location). If we combine any Other Information with Personal Information, the combined information will be treated as Personal Information as long as it is combined.

Security measures

Neeco has implemented technological and operational security processes to protect your personally identifiable information from loss, misuse, alteration, or unintentional destruction. While no security measure can guarantee against compromise, Neeco regularly reviews and updates its security measures in an effort to provide appropriate security for all information held by Neeco. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the "Contacting Us" section below.

Modifications to this Privacy Statement

Neeco reserves the right to change, modify, or update this Privacy Statement at any time. The "LAST UPDATED" legend at the top of this Privacy Statement indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the services. Your use of the services following these changes means that you accept the revised Privacy Statement.

Your rights

Neeco wants to maintain only accurate information about users of the site. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g., when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Information provided until after the completion of such purchase or promotion).

Data retention

Neeco will not retain your Personal Information longer than is necessary and permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Jurisdiction and cross-border transfer

In nearly all cases your Personal Information may be collected or processed by, and transferred to, Neeco facilities in the United States and in other countries where Neeco does business. Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the services you consent to the transfer of information to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country.

If you are located in the EEA: Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here

http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to protect your Personal Information.

Linked Websites

We may provide links to third party sites. Since we do not control these websites, we encourage you to review the privacy statement posted on these (and all) third party sites. Neeco is not responsible for the privacy statements or practices of sites and services controlled by companies or organizations other than Neeco. The inclusion of a link on the services does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the apps or our social media pages.