## **Privacy Statement**

Figlo B.V. believes that protecting the privacy of users, customers, prospective customers, and former customers (individually, "User" and collectively, "Users") is of great importance and that it is necessary for the performance of its service activities. This Privacy Statement describes how Figlo may collect and handle your Anonymous Information and Personal Information, each as defined below, in connection with your activities with Figlo, including those related to Internet services controlled by Figlo, including websites and FTP servers. You should read this Privacy Statement before using this website and before engaging Figlo for products or services. In all cases Figlo complies with the requirements of the Dutch Personal Data Protection Act (Wet bescherming persoonsgegevens).

## Collection and Use of Personal Information

Figlo collects two types of information about our users: Anonymous Information and Personal Information.

"Anonymous Information" is the anonymous information that is automatically collected when you use any of Figlo Internet services. Anonymous Information includes, but is not limited to: IP (Internet Protocol) address; server IP address; server port; domain used to access a Figlo Internet service; referring domain or website; type and version of operating system and web browser; search query (keywords entered into a search engine); the date and time the access occurred; which resources were accessed. Anonymous Information is only used in aggregate form in order to track and improve the efficiency of Figlo Internet services.

"Personal Information" means any information about an identifiable individual, and may include, but is not limited to: (i) your name, address, phone number, fax number, or email address; and (ii) credit and/or billing information. Personal Information also includes any information that (1) is transferred from the EU to the United States; (2) is recorded in any form; (3) is about, or pertains to a specific individual; and (4) can be linked to that individual.

"Sensitive Personal Information" means personal information that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership or that concerns an individual's health.

Personal Information is collected by Figlo when you voluntarily give it to Figlo. We may also receive Personal Information from our business partners and other third parties, provided that such parties confirm to us that you have consented to the disclosure to Figlo of your Personal Information.

Figlo collects and uses Personal Information to provide you with the products and/or services you have requested from us and to contact you in order to provide you with product-related information, including: news; training and support; customized services; product documentation; promotional materials. You may at any time withdraw your consent to any further collection, use or disclosure of Personal Information by giving us reasonable notice.

The User is entitled to view the Personal Information stored and to have it corrected or removed if and insofar as the respective data are in fact inaccurate, incomplete or no longer relevant to the purpose for which they have been processed or are otherwise in violation of the Dutch privacy legislation. Requests must be submitted in writing to the address or email address listed at the end of this Privacy Statement. After receiving a request, and subject to any applicable laws preventing Figlo from providing access, we will contact the requesting User within a reasonable amount of time to arrange a date and method for providing the access that has been requested. If you believe that there is an error in the information we have on file about you, you can request, in writing, that we review and correct the information as necessary. When you file your submission you should include a copy of the updated, correct information. We will verify the authenticity of the submitted documents, as well as their validity for our purposes prior to updating our records.

Figlo will try to ensure that information about you is accurate, complete and up-to date. Figlo will document and archive your information for as long as we have an ongoing business relationship with you and will use the information collected about you only for the purpose for which it was collected. At the time that our business relationship is terminated, we will maintain copies of all information collected as required by applicable law. At the end of the retention period, your information will be destroyed or your Personal Information will be deleted and the sum of the information (which would now be anonymous) will be added to a permanent archive of business statistical information for our use.

Figlo will not pass on any Personal Information to any third parties unless (i) it is in accordance with the purpose for which they have been processed; (ii) the User has given his

consent to Figlo to this end; or (iii) Figlo is legally obliged to disclose these data. Such third parties are only provided with such information as is necessary for the purpose stipulated by Figlo and are subject to strict terms of confidentiality. Figlo will never sell your Personal Information to anyone. If you have questions or concerns about the disclosure of your Personal Information, or if you believe your information has been improperly disclosed by Figlo, contact us at the address contained at the end of this Privacy Statement.

## Security

Figlo is committed to the security of your Personal Information and Figlo has policies and procedures in place to protect the privacy of your Personal Information. Personal Information shall be protected in a manner commensurate with its sensitivity and reasonable steps will be taken to prevent it from being stolen, lost, accessed, copied, used or modified without permission.

When you download, view or send to Figlo documents of a confidential nature, we offer the use of a secure server. The secure server software (SSL) encrypts any information that is sent to you and protects against unauthorized access.

## Cookies

This Website uses cookies which originate from Google Analytics. On the basis of your visit to websites the cookies will assess your areas of interests. With this information Google Analytics is better able to offer information and advertisements on websites. Cookies explicitly do not contain any personal data, they only remember your preferences and interests based on your web surfing behavior. Cookies cannot damage your computer or the files stored on your computer.

You can disable cookies via your browser settings. This has no consequences for the use of this website, only for Google Analytics' advertising policy focused on you. Disabling cookies only has consequences for the computer and the browser on which you do this. If you use multiple computers or browsers you must repeat this action for each computer or browser.

## General

This Privacy Statement is not intended to create any contractual or other legal rights in or on behalf of any party. Figlo reserves the right to change this Privacy Statement at any time by posting revisions on its websites.

If you have questions or concerns about the security of your Personal Information, or if you believe your information has been improperly released, contact us at the email address or the mailing address contained at the end of this Privacy Statement.

## **Contact Information**

You may contact Figlo as follows:

Figlo B.V. Attn: Legal Department 10700 W. Research Drive, Suite One Milwaukee, WI USA 53226

support@advicentsolutions.com

# Figlo Safe Harbor Policy

Figlo adheres to the Safe Harbor Agreement concerning the transfer of personal data from the European Union ("EU") to the United States of America. Accordingly, Figlo follows the Safe Harbor Principles published by the U.S. Department of Commerce ("Principles") with respect to all such data. This Safe Harbor Policy ("Policy") outlines Figlo's general policy and practices for implementing the Principles, including the types of information gathered, how it is used and the notice and choice affected individuals have regarding the use of and their ability to correct that information. This Policy applies to all personal information received by Figlo whether in electronic, paper or verbal format. To learn more about the Safe Harbor program, and to view Figlo's certification, please visit <u>http://www.export.gov/safeharbor/</u>.

## **Principles**

### Notice

Figlo shall inform an individual of the purpose for which it collects and uses the Personal Information and the types of non-agent third parties to which Figlo discloses or may disclose that Information. Figlo shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Figlo, or as soon as practicable thereafter, and in any event before Figlo uses or discloses the Information for a purpose other than for which it was originally collected. *Choice* 

Figlo will offer individuals the opportunity to choose (opt out) whether their Personal Information is (1) to be disclosed to a third party or (2) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. For Sensitive Personal Information, Figlo will give individuals the opportunity to affirmatively or explicitly consent (opt in) to the disclosure of the information to a third party or use for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

### **Onward Transfers**

Prior to disclosing Personal Information to a third party, Figlo shall apply the notice and choice principles. Figlo shall ensure that any third party acting as an agent for which Personal Information may be disclosed subscribes to the Principles or are subject to law providing the same level of privacy protection as is required by the Principles, or that the third party has agreed in writing to provide a level of privacy protection equal to that required by the relevant principles.

### Data Security

Figlo shall take reasonable steps to protect the Information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Figlo has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the Information from loss, misuse, unauthorized access or disclosure, alteration or destruction. *Data Integrity* 

Figlo shall only use Personal Information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Figlo shall take reasonable steps to ensure that Personal Information is accurate, complete, current and reliable for its intended use.

### Access

Figlo shall allow an individual access to their Personal Information and allow the individual to correct, amend or delete inaccurate Personal Information, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in question or where the rights of persons other than the individual would be violated, or as otherwise prohibited by law.