

Aurelia Privacy Notice

Aurelia believes it is important that you understand how Aurelia collects, stores, shares and uses information from and about you which directly or indirectly identifies you (“Personal Data”). This Privacy Notice applies generally to all platforms and websites operated by Aurelia to provide or receive good and services and/or exchange information with our customers or vendors (“Website”). It discloses how we collect, use and disclose Personal Data along with non-personal information collected through the Website or in the course of our business activities conducted elsewhere.

Should another site that is controlled, operated, or administered by Aurelia provide a privacy notice which is inconsistent with this notice, this notice shall govern unless and to the extent the other privacy notice is necessitated by applicable law. This notice does not apply to the information collected, stored, shared, or distributed by third-party sites. This notice may be updated from time to time.

Please read this notice carefully. By visiting our Website you acknowledge the practices described in this notice, subject to those circumstances where your specific consent is requested.

Throughout this Notice we use the term "processing" to cover all activities involving your Personal Data, including collecting, handling, storing, sharing, accessing, using, transferring, and disposing of Personal Data.

For the purposes of applicable data protection law, Aurelia is the controller of any personal information collected from you on the Website or otherwise for the purpose of conducting or developing our business relationship with you.

1. Summary of Key Information About Our Personal Data Processing

We collect and use Personal Data that you provide as part of providing or receiving goods or services from Aurelia, together with additional Personal Data collected throughout the course of our business relationship with you and the company you represent.

The Personal Data we collect is used primarily for managing our business relationships, complying with contracts, and complying with applicable law. The Personal Data is stored in systems in the country where we operate, in Norway or in the U.S. It may be processed by third party service providers acting on our behalf.

You have certain rights in respect of your Personal Data, which you can exercise by emailing support@aredia.com.

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2. Personal Data We Process

2.1 Information We Collect Automatically

When you visit our Website, our server automatically collects certain browser or device generated information, including but not limited to:

- your domain;
- your IP address;
- your date, time and duration of your visit;
- your browser type;
- your operating system;

- your page visits (records of your access);
- information from third parties;
- other information about your computer or device;
- Internet traffic.

We do not use this automatically collected information to try to identify you, and we do not associate it with the information you provide voluntarily, as detailed below.

2.2 Information You Provide

In order to access or use certain portions of the Website or enjoy the full functionality of the Website, or otherwise in conducting business with us or seeking to conduct business with us, you may be prompted to provide certain personal information to us in the following ways:

- by filling in forms (for example, a 'Contact Us' form), on our Website or at a trade show or anywhere else we conduct business;
- by downloading documentation from our Website;
- by subscribing to newsletters or other communications; or
- by corresponding with us by phone, e-mail or otherwise using our contact details

Typically, the personal information you give us may include name, business affiliation, address (home, business, billing, or delivery), telephone number, and email address, and any personal details required to resolve any enquiries or complaints as allowed by applicable law.

This information may be required to enter into a contract with you or a company you represent (such as a purchase agreement) and failure to provide any information may result in our inability to receive or provide requested services or products.

We may also obtain personal information about you from third parties that collect your information on our behalf.

2.3 Cookies

In order to improve the functionality and content of the Website and your overall experience, Auredia has designed the Website to use certain technologies, including cookies, to track access to and use of the Website or gather certain personal information. A cookie is a small file that can be placed on your device's hard drive or on a website server. We use cookies to obtain some of the automatically collected information described above. Most browsers automatically collect cookies, but you do not have to accept a cookie, and you can in fact modify your browser so that it will not accept cookies. If you elect to not allow these technologies to work in conjunction with the Website, you can change your web browser settings, or you can elect to discontinue accessing and using the Website. If you adjust your web browser settings to reduce the interaction of these technologies with the Website, some portions of the Website, its content, or its functionality may be limited. For more information about cookies including how to set your internet browser to reject cookies please go to www.allaboutcookies.org.

Auredia is not responsible for third-parties' use of cookies or other tracking and gathering technologies resulting from your access or use of third-party content or sites, even if such third-party content or sites are linked to the Website.

By continuing to use our Website following display of our pop-up cookie notification banner, you agree to our use of cookies.

Different types of cookies are used for different purposes on our Website, these are known as: strictly necessary cookies, performance cookies, and functionality cookies. Some cookies may be provided by an external third party to provide additional functionality to our Website and these are included below.

Strictly necessary cookies

These are cookies that allow Auredia to recognize your computer or device and your preferences when using the Website and are this essential to fulfil an action requested by you, such as identifying you as being logged in. If you prevent these cookies by adjusting your browser settings we cannot guarantee how our Website will perform during your visit.

Performance cookies

These are cookies used to improve our Website, for example for analytics that let us see how our Website is being used and where to make improvements. These cookies are used to collect information about how visitors use our Website. The information is collected in an anonymous form and includes the number of visitors, where visitors have come from to reach the Websites and the pages they visited.

Functionality cookies

These cookies facilitate your efficient access to and use of the Website and enhance the performance and functionality of our Website, often as a result of something you're doing as a user. For instance, to give you better access to and use of content and functionality on the Website, we may personalize our content for you or remember your preferences or advertise content that is more relevant to you.

Managing and Deleting Cookies

If you want to manage cookies, you can do so from your browser. You can find out how to do this by going to the help menu in your browser. Please see www.allaboutcookies.org for further information.

2.4 Sensitive Personal Information / Special Categories of Personal Data

Some of the Personal Data we collect and use is classified as "Sensitive Personal Information." Some examples of Sensitive Personal Information include data regarding your racial or ethnic origin, religious or philosophical beliefs, trade-union membership, biometric data, health data, data concerning your sex life or orientation, your taxpayer number and driver's license number, and financial data such as your bank account information.

Sensitive Personal information is only used for the purposes listed below in Section 3 below, and only to the extent required for Auredia to perform its obligations in the course of our business relationship with you or the company you represent.

We will not sell your Sensitive Personal Information.

We may share your Sensitive Personal Information with third parties as detailed below in section Some examples of sharing your Sensitive Personal Information include sharing tax information as required by applicable law.

2.5 Children

The Website is not for use by children under the age of 16 years and Auredia does not knowingly collect, store, share or use the Personal Data of children under 16 years. If you are under the age of 16 years, please do not provide any Personal Data, even if prompted by the Website to do so. If you are under the

age of 16 years and you have provided Personal Data, please ask your parent(s) or guardian(s) to notify Auredia and Auredia will delete all such Personal Data.

2.6 Marketing SMS & emails

Where lawful to do so, and subject to your consent where required, we may communicate with you by SMS and email to tell you about our products and services. If you wish to opt-out of receiving marketing communications, please use the 'unsubscribe' link provided in our emails or text the STOP number in our SMS, or otherwise contact us directly and we will stop sending you communications.

3. Legal Basis and Purposes of The Processing of Your Personal Data

We use your Personal Data for a number of purposes, which we detail in Sections 3.2 and 3.3 below. Section 3.1 sets forth the legal basis (justification) for processing your Personal Data.

3.1 Legal Basis for Processing

Whenever we process your Personal Data, we do so on the basis of a lawful justification for processing.

In the majority of cases, the processing of your Personal Data will be justified on one of the following bases:

- it is provided in performance of your contract (or your company's contract) with us, and therefore necessary to give effect to that contract (for example, collecting bank account details to pay amounts due or the provision of goods and services to which the contract pertains);
- you have consented to the processing;
- it is necessary for us to comply with a legal obligation (for example, disclosing tax data to a government authority); or
- it is in our legitimate interests as a business, and our interests are not overridden by your interests, fundamental rights or freedoms (for example, providing related product and safety information). Our legitimate interests may include our interest in developing our business and the business of the Auredia group; in increasing the efficiency of our processes and practices; in striving to ensure compliance with our Code of Conduct and applicable laws and business norms; in avoiding or mitigating harm to you, to our customers, to us and the Auredia group, and to third parties; and in establishing, exercising or defending legal claims.

The processing of Sensitive Personal Information will be justified by one of the above conditions, and normally by one of the following special conditions:

- it is necessary for the purposes of carrying out obligations under applicable law;
- it is carried out subject to your voluntary and explicit consent;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the protection of Auredia's or its customer's property; or
- in exceptional circumstances, it is necessary to protect your vital interests and you are incapable of giving consent.

3.2 Processing for Business Relationship Purposes

Auredia may process your Personal Data for the purpose of establishing and performing our obligations with regard to a Business Relationship with you or the company you represent. This includes processing your Personal Data to:

- conduct and develop our business with you, your company, and with others;

- process, evaluate and complete certain transactions involving the Website, and more generally transactions involving Auredia's products and services;
- operate, evaluate, maintain, improve and develop the Website, and our products and services generally;
- provide you with important product safety and usage information;
- fulfil the purpose for which you provided your personal information;
- customize our Website to users' needs;
- engage you about events, promotions, the Website and Auredia's products and services;
- provide you with documentation or communications which you have requested;
- correspond with users to resolve their queries or complaints;
- provide you with any services or products you request;
- send you marketing communications, where it is lawful for us to do so;
- protect and ensure safety of the Website, Auredia confidential and proprietary information, and Auredia employees;
- monitor and analyze trends, access to, and use of the Website for advertising and marketing purposes, and additionally for the evaluation and training of our employees; and
- manage, protect against and investigate fraud, risk exposure, claims and other liabilities, including but not limited to violation of our terms and conditions, contract terms or laws or regulations.

3.3 Establish, Exercise, and Defend Legal Claims

Auredia may process your Personal Data for the purposes of establishing, exercising and defending potential legal claims. Your Personal Data processed in accordance with this section is processed on the basis of the Auredia's legitimate interest in processing your Personal Data for these purposes to be able to establish, exercise and/or defend potential legal claims in the event of a dispute or controversy between you (or the company you represent) and Auredia, or between Auredia and a third party, related to or implicating the business relationship between Auredia and you or the company you represent.

4. Sources of Personal Data

Primarily the Personal Data we process about you will have been provided by you or the company you represent, either during the creation of our business relationship, the contracting process, or on an ad hoc basis during the course of our business relationship.

During the business relationship evaluation process (such as credit establishment), we may request references from third parties, and carry out screening and vetting processes using third party sources.

We also receive information which may include your Personal Data from others in your company, for example, leads on product or service opportunities.

From time to time, we may also receive Personal Data about you from other third parties, for example customers, other business partners or regulatory bodies.

5. Retention of Personal Data

Our general approach is to only retain Personal Data for as long as is required to satisfy the purpose for which it was collected by us or provided by you, including for the duration of the applicable statute of limitations.

In certain cases, legal or regulatory obligations require us to retain specific records for a set period of time, including following the end of our business relationship.

In other cases, we deliberately retain records in order to resolve queries or disputes which we think may arise from time to time.

6. Disclosure and Transfer of Personal Data

We are part of the global Auredia group, and from time to time it will be necessary to share your information with our affiliated businesses to perform the purposes listed in Section 3 above. We may also appoint third party service providers (operating under our instructions) to assist us in providing information, products or services to you, in conducting and managing our business, or in managing and improving the Website. Auredia may share your Personal Data with these affiliates and third parties for any of the following purposes:

- to perform services that the third parties have been engaged by Auredia to perform on Auredia's behalf, subject to the obligations Auredia assumes under this policy or the appropriate contractual restrictions and security measures;
- if required to do so by law, a legal process, legal authority, or other governmental entity having authority to make the request; or
- if Auredia believes it is reasonably necessary to prevent harm or loss, or it believes that the disclosure will further an investigation of suspected or actual illegal activities,

Auredia reserves the right to share any information that you provide which is not deemed personal information.

You acknowledge that the Website is controlled, operated, and administered by Auredia from its offices in the United States, or hosted on servers located globally, but managed by Auredia. Auredia is a global company and, as a result, Auredia may transfer Personal Data collected on the Website or in the course of conducting business with you and others to other jurisdictions in which Auredia operates. If your Personal Data is transferred from a jurisdiction with applicable privacy laws (such as the EEA) to other Auredia group companies or to third party service providers, we will take steps to ensure that your information receives the same level of protection as if it remained within the original jurisdiction, including by entering into data transfer agreements, using jurisdiction-approved transfer mechanisms such as the European Commission's Standard Contractual Clauses, or by relying on certification schemes such as the EU - US Privacy Shield. You have a right to obtain details of the mechanism under which your information is transferred outside of the EEA by contacting Auredia by emailing support@airedia.com.

We may share your Personal Data with third parties in connection with potential or actual sale of our company or any of our assets, or those of any affiliated company, in which case personal information held by us about our users may be one of the transferred assets.

We will also respond to requests for information where required by to do so by law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us.

7. Security of Your Personal Data

We implement what we determine to be reasonable physical, technical and administrative security standards designed to protect your Personal Data from loss, misuse, alteration, destruction or damage.

We take steps to limit access to your Personal Data to those colleagues or service providers who need to have access to it to process personal data lawfully.

You also have an important role to play in protecting the security of your Personal Data, and you should take care about whom you disclose Personal Data to, and how you protect your communications and devices.

Auredia strives to safeguard and protect your Personal Data from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and Auredia utilizes and maintains certain reasonable processes, systems, and technologies to do so. However, you acknowledge that no transmission over the Internet is completely secure or error-free, and that these processes, systems, and

technologies utilized and maintained by Auredia are subject to compromise. Accordingly, we cannot be held responsible for unauthorized or unintended access that is beyond our control.

7.1 External Links

The Website may contain links to third party sites. Since Auredia does not control nor is responsible for the privacy practices of those websites, we encourage you to review the privacy policies of these third-party sites. This Notice applies solely to Personal Data collected by our Websites or in the course of our business activities.

8. Your Rights

Subject to applicable law, you may have some or all of the following rights in respect of your Personal Data:

- to obtain a copy of your Personal Data together with information about how and on what basis that Personal Data is processed;
- to rectify inaccurate Personal Data (including the right to have incomplete Personal Data completed);
- to erase your Personal Data (in limited circumstances, such as where it is no longer necessary in relation to the purposes for which it was collected or processed);
- to restrict processing of your Personal Data where:
 - the accuracy of the Personal Data is contested;
 - the processing is unlawful but you object to the erasure of the Personal Data;
- we no longer require the Personal Data, but it is still required for the establishment, exercise or defense of a legal claim;
- you have objected to processing on the basis of our legitimate interests;
- to port your data in machine-readable format to a third party (or to you) when we justify our processing on the basis of your consent or the performance of a contract with you;
- to withdraw your consent to our processing of your Personal Data (where that processing is based on your consent);
- to object to decisions which are based solely on automated processing or profiling; and
- to obtain, or see a copy of the appropriate safeguards under which your Personal Data is transferred to a third country or international organization.

In addition to the above rights, you have the right to object to any processing of your information which we have justified on the basis of a legitimate interest, including profiling (as opposed to your consent, or to perform a contract with you). You also have the right to object to any processing of your information for direct marketing purposes, including profiling for marketing purposes.

You also have the right to lodge a complaint with your local supervisory authority for data protection, for example the ICO in the UK, the CNIL in France or the AEPD in Spain.

In relation to all of these rights, please contact us using the details given below. Please note that we may request proof of identity, and we reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. We will endeavor to respond to your request within all applicable timeframes.

9. Contact Us

To make a request regarding your data privacy rights or if you have any questions/concerns regarding the processing of your Personal Data/wish to exercise any of your rights, please contact us at support@airedia.com.