



NetPMD Privacy Policy – Updated November 2024

NetPMD Design and Integration Ltd. and NetPMD LLC respect your privacy and is committed to protecting your personal data.

This privacy policy provides you with details of how we use (“process”) your personal information as described in Section 2 (“Personal Information”) that we collect when you visit our Website (regardless of where you visit it from) or interact with us in any other way.

We may update and amend this Privacy Policy by posting an amended version on our website.

1. IMPORTANT INFORMATION

“NetPMD,” “we,” “us” or “our” refers to NetPMD Design and Integration Ltd. and our corporate affiliates (NetPMD LLC).

This policy applies to the Personal Information described in Section 2, in NetPMD’s role as a data controller, and applies only to sites and services under our control. This policy does not apply to any content, data, or information processed, stored, or hosted on behalf of our business customers (each, a “customer;” collectively, “customers”), as part of the NetPMD services described on one or more applicable order forms or agreements. In such case, NetPMD is a data processor for its customers and the terms of our Data Processing Addendum will apply to such processing where applicable.

This Privacy Policy is published to make it easy for our users, Customers, and the public to understand what personal data we collect, store, and process, why we do so, how we receive and/or obtain that information, and the rights an individual has with respect to their data in our possession.

By visiting www.netpmd.com or using our services, individuals consent to how we obtain and process personal data, including the purposes for which we process data and how we share data internally and with third parties. By using this website, you accept the conditions outlined in this Privacy Policy.

You do not have to give us any personal information to visit our website. However, if you wish to subscribe to a service, webinar or event, enquire about a product or service, sign up for our newsletter, or take part in a specific promotional campaign, prize draw or competition, we may



collect Personal Information including but not limited to your name, email address, phone number, job title, company name, address, and country location.

Please note that:

1. We monitor and record electronic communications to ensure compliance with applicable rules and laws and our internal policies, and for business continuity purposes.
2. We use cookies, web beacons, and similar technologies (together “Cookies”) on our website and in marketing emails to help us manage and improve our website, your browsing experience, and (where you are known to us) the material/information that we send you. Where Cookies are placed by third parties (such as Google Analytics), your Personal Information may: (a) be processed by that third party in another authority for its own purposes; and (b) accessible to local government authorities.
3. As a global business, we will share certain Personal Information with our global employees and consultants, and select third parties, subject to appropriate safeguards.
4. Our services are designed for businesses and are not intended for personal or household use. Accordingly, we treat all Personal Information covered by this Privacy Policy, including information about any visitors to our website, as pertaining to individuals acting as business representatives, rather than in their personal capacity.

If you do not wish to provide us with your personal data or to have it processed by us or any of our Sub-Processors, please do not provide it to us.

2. WHAT DATA DO WE COLLECT ABOUT YOU?

The categories of Personal Information we collect will vary, depending on our specific relationship with you, and the context.

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at that time.



Personal Information means any information about an individual from which a person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store, and transfer various kinds of Personal Information about you which we have grouped together as follows:

Type of Data	Examples
Identity Data	Your first name, last name, username, or similar identifier.
Contact Data	Your business address, email address, and telephone numbers.
Profile Data	Your interests, preferences, feedback, and survey responses.
Usage Data	Information about how you use our website and services.
Marketing and Communications Data	Your preferences in receiving marketing communications from us and our third parties and your communication preference.

We do not collect any Special Categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), nor do we collect any information about criminal convictions and offenses.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

You will voluntarily provide most of your Personal Information directly to us. We may also obtain Personal Information from other sources or persons, including

Public Information

Personal Information about you or your business that is publicly available, for example on your or your employers' website, public professional social networking sites, the press, and relevant electronic data sources.



Information From Third Parties

Personal Information provided to us by third parties (for example by our or your customers; agents; suppliers; advisers; consultants, professional experts; counter-parties; previous, current and future employers; correspondents and enquirers; regulators and public authorities; and other persons) where such Personal Information is provided to us in connection with the relevant purposes set out in this Privacy Policy.

Information Collected Through our Website

We use Cookies on our website and certain marketing emails that collect your IP address and certain other information from you when you visit our website. For further details, please see the 'Cookies' section below.

We may also automatically collect information about the website you came from or are moving to, the pages you visit on our website, IP address data, the type of browser used, and the time of site access. This information will be aggregated and not used to identify you directly.

It is important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at info@netpmd.com.

4. HOW WE USE YOUR PERSONAL INFORMATION

Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it. However, we will normally collect Personal Information from you only where we have your consent to do so, where we need the Personal Information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Information from you.

Our processing of your Personal Information will include obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including organizing, copying, analyzing, amending, retrieving, using, systemizing, storing, disclosing, transferring, retaining, archiving, anonymizing, erasing or destroying it by automated or non-automated means.

Legal Basis for Processing Personal Information



The EU or UK General Data Protection Regulation (“GDPR”) requires us to communicate to you the purposes for which we Process your Personal Information, together with the corresponding ‘Legal Basis.’ We may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data as set out in the table below.

Purpose/Activity	Type of data	Legal basis for Processing
To register you as a prospective new customer	(a) Identity (b) Contact	Necessary for our legitimate interests
Deliver services promised to our customers (including any free services) or prospective new customers	(a) Identity (b) Contact (c) Profile	Necessary to comply with a legal obligation
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests to keep our records updated and to analyze how customers use our products / services
To enable you to complete a survey, poll, or Q&A	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	Necessary for our legitimate interests (to study how customers or prospective customers use our services, require from our services, to develop them and grow the business)



To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	It is necessary for our legitimate interests to analyze how customers use our products / services to develop and grow the business.
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical	Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform us marketing strategy
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Profile	Necessary for our legitimate interests to develop us products/services and grow our business
To comply with any other obligation to which we are subject under applicable rules and law.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (f) Technical	Necessary to comply with a legal obligation



We consider that our legitimate interests and the uses above are proportionate and compatible with your interests, legal rights, or freedoms.

CHANGING YOUR PREFERENCES

You can change your preferences for receiving group marketing emails and other information from us by clicking on the 'manage preferences' link in a NetPMD marketing email.

You also have the right to ask us not to process your Personal Information for marketing purposes - and can exercise the right at any time by sending us an email at info@netpmd.com.

Where you opt out of receiving our marketing communications, this will not apply to Personal Information provided to us because of a product/service purchase, product/service experience or other transactions or where we have a legal obligation to retain your data.

5. COOKIES

We use Cookies on our Website to make sure the site functions as it should (e.g., to ensure images display correctly, to store your preferences, and to prevent errors).

Where you agree to Cookies through our website cookies banner, and/or click on a link or other direct mailing from us, we will also use certain Cookies to:

- Analyse how our website and online services are performing; and
- Personalize the content that you see on our website (and, where you are known to us, that we send you), based on your previous use of the website.

You can set your browser to refuse all or some browser cookies or to alert you when websites set or access cookies.

If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Please note that some of the Cookies on our website are third-party Cookies (e.g., Google advertising cookies) which we do not control.



For more information about cookies and how to disable and/or delete them, please visit www.aboutcookies.org

6. DATA STORAGE AND SECURITY

We and our authorized Sub-Processors maintain, store and process personal data in the United States of America, Europe, and other locations, as reasonably necessary for the proper performance and delivery of our services, or as may be required by law. NetPMD is committed to protecting personal data in accordance with this Privacy Policy and customary industry standards, and such appropriate lawful mechanisms and contractual terms require adequate data protection, regardless of any lesser legal requirements that may apply in the jurisdiction to which such data is transferred.

We limit access to your Personal Information to those employees, agents, contractors, and other third parties who have a business need to know such data. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality.

We keep these arrangements under regular review, considering security and compliance best practices, current risks, threats, vulnerabilities, mitigating controls, technology, and changes in applicable legal requirements.

However, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Information transmitted to our website – and any such transmission is at your own risk.

7. DATA RETENTION

We will only retain your Personal Information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information, and whether we can achieve those purposes through other means, and the applicable legal requirements.



By law, we must keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances, you can ask us to delete your data, see Section 10 below for further information.

We may anonymize your Personal Information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. YOUR LEGAL RIGHTS

Individuals have rights concerning their Personal Information. Please contact us by e-mail at info@netpmd.com if you wish to exercise your privacy rights under any applicable law, including the GDPR, the CCPA, the California Privacy Rights Act (CPRA), or the Virginia Consumer Data Protection Act (VCDPA). Such rights may include – to the extent applicable – the right to know/request access to (specific pieces of personal data collected; categories of personal data collected; categories of sources from whom the personal data was collected; purpose of collecting personal data; categories of third parties with whom we have shared personal data), to request a copy of your personal information, to request rectification or erasure of your personal data held with us, or where consent is the legal basis for collecting the information to withdraw consent, or to restrict or object to such personal data processing (including the right to direct us not to sell your personal data to third parties now or in the future), or to port such personal data, or the right to equal services and prices (e.g. freedom from discrimination) (each to the extent available to you under the laws which apply to you).

You will not have to pay a fee to access your Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. If your request relates to Personal



Information that may be processed on our customer's behalf, as their "data processor," note that such Customer exclusively determines how such data is processed, as well as if and how your request should be handled – so we advise that you submit your request directly to them.

Last updated: October 2024