

# Privacy Policy

This document sets forth the Atrinet Ltd. online privacy policy (“Privacy Policy”) for [www.atrinet.com](http://www.atrinet.com) (this “Site”). By accessing the Site, you are accepting the Privacy Policy as set forth herein. If you have objections to the Privacy Policy, you should not access or use this Site. Throughout this policy, reference to “Atrinet” or "Atrinet Ltd." includes the any of Atrinet Ltd.'s subsidiaries and affiliates worldwide.

## INFORMATION WE COLLECT AND HOW WE USE IT

### **Collection of Personal Information**

By logging into the Atrinet web-sites and by providing any information, Atrinet assumes you are interested in obtaining more information about our company, our affiliates, our technology and product offerings. When you submit a request or electronically provide information to Atrinet (including, but not limited to, comments, feedback, employment applications and resumes), you are sometimes asked to provide certain information, including, but not limited to, your name, title, company, address, phone and fax numbers, e-mail address and line of business. We ask for this personally identifiable information in order to facilitate your requests, provide personalized service and communicate separately with you. Except as otherwise set forth herein, we do not sell, trade, or rent your personally identifiable information with any third parties outside of Atrinet.

*Business Alerts, Newsletters and Other Communications* – You may provide personal information such as your name and contact details to receive business alerts, newsletters and other communications (including emails). It is in our legitimate business interests to use the information you provide to send you the communications and information you have requested and to communicate with you about our products and services. If you no longer want us to send you business alerts, newsletters or other communications, you may unsubscribe at

any time by e-mailing us at [office@atrinet.com](mailto:office@atrinet.com) or clicking the “unsubscribe” link located at the bottom of an email sent to you by Atrinet.

*Business Purposes* – On our website you may be able to register using your personal information to gain access to information related to your business relationship with or products/services of Atrinet. We use these details to provide you with access to information about your business relationship with us and to facilitate your use of our website. You may also choose to provide, or we may obtain, your personal information at trade shows or from our distributors. It is in our legitimate business interests to use this information so that we can manage our business relationships and carry out marketing and sales activities.

You may also choose to connect to us via social/professional networking services (e.g., LinkedIn, etc). When you connect to us via a social networking service we may collect personal information that you have provided to that service in accordance with the service’s applicable Terms of Use and your privacy settings within that social networking service. We may also choose to supplement information you have provided to us by obtaining additional demographic information about you from third-party sources in order to improve our communications with you, give us better insight into your needs, and improve our business where permitted under local law.

*Careers* – Individuals from all over the world apply for jobs with Atrinet through our website, third-party job posting sites, job fairs, or directly to the business locations. The information job seekers provide through this process may be maintained by third-party service providers. This information may be maintained in locations within the United States, Israel or the EU, accessible to our global recruiting team, and be shared with our corporate affiliates for the purpose of evaluating you for positions within our company. The information submitted by job seekers, such as name, contact details and any other information relevant to the application is used to evaluate their qualifications for employment and to contact them regarding possible employment opportunities. It is in our legitimate business interests to use this information in the selection process and to communicate with you, and it will be necessary to provide us

with this information so that we can assess your application. Job seekers may also choose to provide sensitive personal information such as gender or ethnic background. Providing this data is optional and is not required to apply for a job with Atrinet. This information will not be considered in evaluating candidates' qualifications for employment.

*Contests, Sweepstakes, Promotions* – We may collect personal information such as your name, IP address, tracking website activities, private social account, job title and/or other contact details, if you wish to participate in contests, sweepstakes, promotions, or e-commerce activities related to Atrinet or our products or services. If you provide another person's information to us, you must first obtain appropriate consent from that individual prior to providing this information to us and in order for us to use this information in the manner indicated. It is in our legitimate business interests to use your personal information to communicate with you and to process your requests. When we process personal information to meet our legitimate interests, we put in place vigorous safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

*Contractual Obligations* – If you are a vendor, contractor, customer and/or partner we may ask you to provide personal information such as your name, contact details or business details to establish and administer our relationship, and for compliance with internal and legal requirements. We use your information for this purpose so that we can comply with our contractual obligations to you.

*Claims, Incident and Grievances* – When you provide information about a claim, incident or grievance, detailed personal information including your name, contact details and any relevant information about the claim, incident or grievance may be collected. We use these details to investigate and comply with any applicable company or legal requirement. We may transfer and disclose your information to third-parties as required in the course of the investigation or to comply with any legal obligation related to the information you provide.

*Information Technology (IT) Security* – We may collect personal information when detecting and defending against security threats in accordance with our legitimate business interests and our legal obligations. We use various IT tools to detect and defend against online security threats (e.g., attacks, viruses, malware, spam, phishing, malicious web content), to promote business continuity of our information systems and assets, and to maintain optimal performance of our IT systems. To ensure physical security of our facilities we may, where permitted under local law, utilize surveillance systems and/or location tracking while you are on Atrinet's property. Atrinet has taken all appropriate measures to prevent unauthorized access to improper use and the inaccuracy of your personal information. In proportion to the sensitivity of the information, we maintain reasonable administrative, technical and/or physical safeguards and appropriate security measures to protect personal information from loss, misuse or unauthorized access, disclosure, alteration, or destruction of the information you provide. However, we cannot guarantee the security of your personal information, as no electronic data transmission or storage of information is completely secure. If an incident is reported affecting your information, we will investigate and comply with all required reporting obligations.

*Other Uses of Information* – We may use the personal information you provide to us for internal general business purposes in accordance with our legitimate business interests. These purposes include administration of our websites, data analytics, fraud prevention and compliance with our legal obligations, standards, policies and procedures (i.e., due diligence checks and sanction screening where applicable).

### **Information We Collect By Automated Means**

Atrinet is committed to the privacy of its website visitors. Please note that we may provide aggregate statistics about our customers, traffic patterns and related Site information to reputable third parties, but these statistics will include no personally identifying information. Aggregated user information does not personally identify you or any other user (for example, we may aggregate user information to calculate the percentage of our users who have a

particular area code). Aggregated data is treated in accordance with this Privacy Policy.

*Browser and Device Information* – Certain information is collected by most browsers or automatically through your device, such as your computer type, geo-location, operating system name and version, device manufacturer and model, Internet browser type and version and the name and version of the online services you are using. We use this information to ensure that the online services function properly.

*“Cookies”* – Cookies are pieces of information stored directly on the computer or mobile device that you are using. Cookies allow us to collect information such as browser type, time spent on the online services, pages visited, referring URL, and other aggregated website traffic data. We and our service providers use the information for security purposes, to facilitate navigation, to display information more effectively, to collect statistical information, and to personalize your experience while online. From time to time, we may place information on your computer to allow us to identify you. By showing how and when our visitors use this Site, this information can help us improve our Site on a continual basis. The use of cookies is an industry standard and many websites utilize them.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You can choose whether to accept cookies by changing the settings on your browser or, depending on your jurisdiction, by managing your tracking preferences as noted in a separately posted cookie statement or via a posted cookie manager. If, however, you do not accept cookies, you may experience some inconvenience in your use of the online services – for example, we may not be able to recognize your computer. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

*IP Address* – Your Internet Protocol (“IP”) address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the online services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services.

Like many websites, Atrinet uses automatic data collection tools, such as cookies, embedded web links, and we use IP addresses for purposes such as calculating usage levels, diagnosing server problems and administering our online services. We may also derive your approximate location from your IP address to understand from what regions of the world our website visitors come. These tools collect certain standard information that your browser sends to our website such as your browser type and the address of the website from which you arrived at our website. They may also collect information about IP address and clickstream behavior (for example, the pages you view and the links you click). These tools help make your visit to our website easier, more efficient and more valuable by providing you with a customized experience and recognizing you when you return.

Third-party vendors, including Google, might show Atrinet ads on sites across the Internet. Third-party vendors, including Google, can use cookies to serve ads based on your past visits to our website. You can opt out of Google’s use of cookies by visiting Google’s [Ads Settings](#). [Please insert the relevant link].

*Physical Location and Mobile Location-Based Services* – We may collect the physical location of your device if you have consented to us doing so, by, for example, using satellite, cell phone tower, Wi-Fi signals, or other technologies. We may use your device’s physical location to provide you with personalized location-based services and content.

## **WITH WHOM DO WE SHARE YOUR INFORMATION?**

We do not sell or otherwise disclose your personal information except as described in this Privacy Policy. We may also share your information as disclosed at the time you provide it and in the following circumstances:

*Business Transfers* – We may disclose your personal information, usage information, and other information about you to parties acquiring part or all of our assets, as well as to attorneys and consultants. If we transfer your information to an acquirer, we will use reasonable efforts to direct the acquirer to use your information in a manner that is consistent with this Privacy Policy. Also, if any bankruptcy or reorganization proceeding is brought by or against us, your information may be considered a company asset that may be sold or transferred to third parties.

*Corporate Affiliates* – We may share the information you provide (such as information about your orders, inquiries, applications or use of our websites) within Atrinet for marketing, recruitment and internal reporting purposes. We do this to run our business more efficiently and to have a better understanding of our customers across business lines.

*Law Enforcement Agencies, Courts, Regulators, Government Authorities or other Third Parties* – We may transfer and disclose your information to third parties: (i) to comply with a legal obligation, (ii) when we believe in good faith that the law requires it, (iii) at the request of governmental authorities conducting an investigation, (iv) to verify or enforce our policies, Terms of Use and other agreements or to protect the rights, property, or safety of Atrinet, our customers, or others (v) to respond to an emergency, (vi) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity or (vii) otherwise to protect the rights, property, safety, or security of third parties, users of our services or the public.

*Marketing Partners* – In some cases, we may permit certain network advertising companies and publishers to collect personal information on our sites. In addition, our business partners may access personal information about you that we have combined with such business partners' data. We may collaborate with

our business partners to jointly send tailored promotional communications to you using the combined set of information. If you prefer not to receive these joint communications, you can opt out by following the instructions included in any such communication.

*Sharing With Your Consent* – Our services may present you with the opportunity to opt in to receive information or marketing offers from third parties or to otherwise consent to the sharing of your information with third parties. If you agree to have your personal information shared, your personal information will be disclosed to the third-party subject to the privacy notice and business practices of that third party.

*Third-Party Service Providers* – In order to carry out your requests, to make various features, services and materials available to you through the services, to respond to your inquiries, and for other purposes described in this Privacy Policy, we may share your personal information or usage information with third parties that perform functions on our behalf (or on behalf of our partners), such as companies or individuals that: host or operate our sites; analyze data; provide customer service; mail product samples or manage payments; advertisers; sponsors or other third parties that participate in or administer our promotions, e-commerce activities, provide marketing or promotional assistance (such as in connection with winner selection, prize fulfillment, and as required by law, such as on a winners list), or assist with risk management, compliance, legal and audit functions. These service providers are not authorized by us to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements. Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located (or in which we provide the services). See the section on “International Transfers of Personal Information” below for more information.

## **INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION**

Atrinet is a global organization that does business in many countries. We may share your personal information among our subsidiaries/affiliates, our service

providers, and other third parties that may be located in countries outside of your own. Although the data protection laws of these various countries may differ from those in your own country, we have put in place appropriate safeguards (such as contractual commitments) to ensure that your personal information is handled as described in this Privacy Policy and in accordance with the law. For transfers of data outside of the European Economic Area (“EEA”), this includes standard contractual clauses approved by the European Commission. For more information on the appropriate safeguards in place, please contact us at [office@atrinet.com](mailto:office@atrinet.com).

## **HOW LONG IS PERSONAL INFORMATION RETAINED**

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law
- Defend or bring any existing or potential legal claims
- Address any complaints regarding the services

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

## **CHANGING AND ACCESSING YOUR PERSONAL INFORMATION**

You may have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information;
- correct the information we hold about you;
- erase your personal information;
- restrict our use of your personal information;
- object to our use of your personal information;

- withdraw your consent for us to use your personal information, if applicable;
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability); and
- lodge a complaint with your local data protection authority (if applicable).

Atrinet will on its own initiative, or at your request, replenish, rectify or erase any incomplete, inaccurate or outdated personal data. You can update your contact information by e-mailing [office@atrinet.com](mailto:office@atrinet.com) with the subject line heading of “Privacy Policy Request”. We may keep all information in an off-line form, for archival purposes or as otherwise required by law. Please note that if your information is removed from our databases, you may no longer be able to access certain areas of our website requiring registration or a subscription. We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate. Please note that we will likely require additional information from you in order to verify your identity and respond to your requests. If you would like to discuss or exercise your applicable rights, subject to limitations established under local law, please contact us at [office@atrinet.com](mailto:office@atrinet.com). We will respond to you within a reasonable time and within the time limits established by applicable law.

## **CHANGES**

Atrinet may without notice change, modify or withdraw access to this Site, or the content of these pages at any time. The materials presented here are summary in nature, subject to change, and intended for general information only. Additional details and specifications concerning the operation and use of Atrinet products are available in the applicable technical literature.

## **DISCLAIMER**

As defined under the General Data Protection Regulation (“GDPR”), Atrinet does not consider itself to be a “data processor” but may be considered a “data controller.” This is not to say that Atrinet never processes any personal data

relating to its customers – it will in the normal course of doing business, collect limited amounts of personal data in relation to its customers (and, where relevant, the employees of its customers). This would include the addresses, telephone numbers and emails as well as other contact details of individuals at customer organizations. This information will be collected primarily for the purpose of distributing the product(s) ordered, and providing related support services, if applicable. All data collected by Atrinet is stored in secure hosting facilities. Atrinet assumes no responsibility for the content or privacy practices of any other website, company or organization, including websites that may be accessed through a hyper link from our site. Please review the privacy policy of such sites before providing information.

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