PRIVACY POLICY

Network Innovations is committed to protecting the privacy and personal data of individuals whose personal data we process, including visitors to our website (the "Site").

This policy sets out how we will treat your personal data and information.

This policy applies to Network Innovations Inc., and its affiliates (collectively, "Network Innovations", "NI", "we", "us"). The NI entity that determines the purposes and means of the relevant processing acts as controller; please contact us using Section (16) to identify the relevant entity for your relationship with NI.

The policy covers personal data collected through the Site, our customer portal, and our business relationships with customers, suppliers, partners and job applicants.

Network Innovations operates on a business-to-business basis. We have no access to the content of calls or messages carried over satellite networks. Call detail records and network data are generated and held by the relevant network operator, which acts as an independent controller under its own privacy policy.

Network Innovations has its headquarters in Canada. Personal data we collect may be processed in Canada, the United States and other countries where we or our service providers operate. Section (6) explains how we protect personal data transferred internationally.

Network Innovations endeavors to apply suitable safeguards to protect the privacy and security of your personal information and to use it consistent with your relationship with Network Innovations and the practices described in this Privacy Policy.

We do not engage in advertising, selling of personal information to third parties, or other such activities that use personal information for anything beyond provisioning of our products and service, managing business relationships and, where permitted, marketing communications.

Our Site also uses cookies. Strictly necessary cookies are used to operate the Site. Where required by law, we use analytics, social media and other non-essential cookies only with your consent, given through our cookie banner. See Section (2) for details.

(1) TYPES OF INFORMATION COLLECTED

You can browse the Site without registering with us or creating an online account**.** However, we collect information from the users of the Site at several different points. For example, we collect and/or request information when a user:

1. Places an order
2. Registers on the Site
3. Requests notification of an order status
4. Participates in an online sweepstakes or survey
5. Requests a product or service catalog or other information
6. Submits an E-mail
7. Uses our customer portal
8. Does business with us as a customer, supplier or partner

In order to fulfill the requests of Site users in the above instances, the user may be requested to provide, and we may collect personal information about you.

- Information we collect when you register:
- Your first and last name;
- Your telephone number;
- Email address;
- Job function;
- Job title;
- Organization name and size; location; and
- Whether or not you are acting on behalf of a current customer.

- Information we collect when you place an order:
- In addition to the above, your credit card information may be collected. Card payments are handled by a PCI DSS-compliant payment processor, and we do not store full card numbers.
  We use a credit card processing company to bill purchasers of products and services from the Site and depending upon the products and services being ordered and where they are being shipped, we may also use outside suppliers and/or delivery companies to assist us in fulfilling and delivering orders. We share with them the information necessary to enable such card processing, fulfillment, and delivery of products (i.e. name, address, and as appropriate, payment information).

- Information we collect when we obtain online feedback from you:
- Your name;
- Online contact information; and
- Any other personal information that you choose to provide in the context of obtaining online feedback from you.

- **Information we collect when you use our customer portal:**
- Your name, business email address, telephone number and job title;
- Your login credentials and account settings;
- Account, order, billing and support history for your organisation; and
- Security and audit log data, such as IP address, login times and actions taken in the portal.

- **Information we collect about business customers, suppliers and partners:**
- Business contact details of your representatives;
- Contract, order, invoicing and payment information; and
- Equipment and service identifiers linked to your organisation's account (such as serial, IMEI and SIM/ICCID numbers), used to activate, support and bill services.

- **Technical information we collect automatically when you visit the Site:**
- IP address, browser type, device type and operating system;
- Pages visited, referring website, and date and time of visit; and
- Information collected through cookies (see Section (2)).

- Information that we may collect when you apply online via the Site for employment:

- Your name;
- Your address;
- Your phone number;
- Your email address;
- Job preferences, experience, desired salary, relocation preferences;
- Work authorization, security clearance;
- Education, job skills and other information contained on your resume or curriculum vitae (CV). Network Innovations uses such information solely for consideration of your candidacy for employment, to communicate with you and to generate related correspondence, including offer letters and employment agreements. Such information may also be used, subject to applicable local laws, to conduct necessary background checks for compliance and other employment-related purposes.

- Information we may obtain from other sources:

- Updated business address information;
- Purchase history;
- Demographic information; and
- Credit information about customers, vendors, or business partners from credit reference agencies.

(2) COOKIES

A cookie is a small text file placed on your computer to collect standard internet log information and visitor behaviour information. It is generated by a web server (which is basically the computer that operates a website) and can be used by that server whenever the user visits the site. A cookie can be thought of as an internet user's identification card, which tells a website when the user has returned.

Our cookies can't harm your computer, and we do not use them to store information such as your name or contact details. Some cookie identifiers may, however, be treated as personal data under applicable law.

This Site uses two types of cookies: cookies set by Network Innovations and cookies set by third parties (i.e. other websites or services).

Network Innovations' cookies enable us to keep you signed into your account throughout your visit and to tailor the information displayed on the Site to your preferences. These are strictly necessary cookies and are essential in helping you to move around our Site and use their features, such as accessing secure areas of the Site. These cookies don't gather any information about you that could be used for marketing or remembering where you've been on the internet.

Cookies set by third parties are cookies linked to services provided by third parties, such as 'Like' buttons and 'Share' buttons. A third party provides these services in return for recognising that you have visited our Site. An example of this includes a link to social networks like Facebook, LinkedIn, and Instagram that may subsequently use information about your visit to target advertising to you on other websites. All these cookies are managed by third parties, and you may use the third parties' own tools to prevent these cookies.

We also use third party cookies to help us analyse how people are using our Site's features to improve it for future users. Beyond that, we also use cookies to integrate content with our social networks, such as Facebook, LinkedIn, Instagram, and Twitter.

Except for strictly necessary cookies, we place cookies only with your consent where the law requires it. You can give, refuse or withdraw consent at any time through our cookie banner or cookie settings

[lPrivacyOfficer@networkinnovations.com]. You can also block or delete cookies in your browser settings, although blocking strictly necessary cookies may affect how the Site works.

If you would like more information about the cookies we use, please contact us.

(3) PURPOSES AND LEGAL BASES FOR PROCESSING

We collect information:

- To provide Network Innovations' products and services based on your location
- To send you an account confirmation
- To personalize your experience
- To respond to customer service requests
- To administer your account
- To respond to your questions and concerns
- To identify you when you submit or share your content

We may use your information to:

- Administer the Site;
- Improve your browsing experience by personalising the Site;
- Send you general (non-marketing) communications;
- Send you email notifications which you have requested or consented to receiving such;
- Send you our marketing communications which we think may be of interest to you where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer wish to receive marketing communications); and
- Deal with enquiries and complaints made by or about you relating to the Site
- Operate, secure and improve the Site and our customer portal, including detecting and preventing fraud and security incidents;
- Manage our relationships with customers, suppliers and partners, including contracts, invoicing and credit checks; and
- Comply with our legal obligations, including tax, accounting, export control and sanctions screening requirements.

We may combine the data you provide with other users' data, and we may share it with third parties in aggregated form as long as no personally identifiable information is included.

Where you submit material for publication on our Site, we may publish and otherwise use that material in accordance with the applicable terms governing your submission. Information made publicly available online may be accessed by persons outside your country.

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

Legal bases (EEA and UK). Where the GDPR or UK GDPR applies, we rely on the following legal bases:



- **Contract:** to provide products and services, process orders and administer accounts;
- **Legitimate interests:** to manage our business relationships, secure our systems, improve our Site and services, and send relevant business communications. You may object to this processing at any time;
- **Legal obligation:** to meet tax, accounting, export control and other legal requirements; and
- **Consent:** for non-essential cookies and, where required by law, marketing emails. You may withdraw consent at any time.

We do not make decisions about you based solely on automated processing that produce legal or similarly significant effects.

(4) YOUR RIGHTS AND CHOICES

Depending on where you are located, you may have the right to:

- Access the personal information we hold about you;
- Correct inaccurate or incomplete information;
- Request deletion of your information;
- Restrict or object to our processing, including objecting to direct marketing at any time;
- Receive your information in a portable format;
- Withdraw consent where we rely on it; and
- Complain to a data protection authority (see Section (14)).

To exercise these rights, contact us using the details in Section (16). We will respond within the time required by applicable law (generally one month in the EEA and UK, and 30 days in Canada) and may need to verify your identity first. If we delete your information, you may no longer have access to services that require registration.

Note: Even if you are not registered with us, we collect Navigation and click-stream data, HTTP protocol elements and search term data, which help us to optimize the browsing experience. We do not use this data to identify you unless you are registered on the Site.

The users of the Site are always given the opportunity to 'opt-out' of having their information used for purposes not directly related to the Site at the point at which we ask for the information or when they receive an online requested promotional communication.

For example, our e-mail messages have an "unsubscribe" feature for users of the Site who don't want to be notified about special offers in the future. Users can simply 'click' on the "unsubscribe" button.

Further, you may opt out of receiving marketing communications from Network Innovations. To opt out of receiving marketing communications please send an opt out email to marketing@networkinnovations.com. Please note that, by opting it out, you acknowledge and agree that you will not receive emails concerning promotions, campaigns, new products, upgrades and enhancements to Network Innovations products.

However, we will continue to send you services-related (non-marketing) communications in connection with the administration of your account and products or services that you have requested from Network Innovations.

(5) DISCLOSURE

We may disclose information about you to our employees, officers, agents, vendors or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.

This includes:

- Other Network Innovations group companies, for the purposes described in this policy;
- Satellite network operators and airtime providers (such as Iridium), to the extent needed to activate, provide and support services your organisation orders;
- Service providers acting on our behalf, such as IT and cloud hosting, payment processing, logistics and professional advisers. Our current sub-processor list is published at https://trust.networkinnovations.com/subprocessors; and
- A prospective or actual purchaser, investor, successor or its professional advisers in connection with a proposed or completed merger, acquisition, financing, restructuring or sale of all or part of our business or assets, subject to appropriate confidentiality and data protection safeguards.

In addition, we may disclose your personal information:

- To the extent that we are required to do so by law;
- In response to lawful requests by public authorities, including meeting national security or law enforcement requirements;
- In connection with any legal proceedings or prospective legal proceedings; or
- To protect our rights, protect your safety or the safety of others, investigate fraud, and/or reduce credit risk

Except as provided in this Privacy Policy, we will not provide your information to third parties.

(6) INTERNATIONAL DATA TRANSFERS

Because we operate globally, personal data may be transferred to and processed in countries other than the one where it was collected, including Canada, the United States, the United Kingdom, the European Union, Malaysia and Australia.

Where personal data is transferred from the EEA, UK or Switzerland to a destination not covered by an applicable adequacy decision, we implement a lawful transfer mechanism and supplementary measures where required, as appropriate to the transfer.

- Applicable adequacy decisions, including the EU adequacy decision for Canadian commercial organisations subject to PIPEDA, only to the extent the relevant recipient and transfer fall within its scope;
- Appropriate intra-group contractual safeguards, including the EU Standard Contractual Clauses where implemented and applicable; and

- The EU Standard Contractual Clauses and the UK International Data Transfer Addendum or other applicable UK transfer mechanism, and corresponding Swiss safeguards where required, with our service providers.

You can request more information about these safeguards by contacting us.

(7) SECURITY

Network Innovations is committed to protecting the information you provide to us. To prevent unauthorized access, maintain accuracy, and ensure proper use of information, we will take reasonable technical precautions and employ physical, technical, and administrative processes to safeguard and secure the information we collect. We operate an information security management system certified to ISO/IEC 27001. When users submit sensitive information via the Site, we will take reasonable technical precautions to prevent the loss, misuse, or alteration of your personal information to ensure that information is protected both online and offline.

We will store all the personal information you provide on our secure (password and firewall protected) servers. All electronic transactions you make to or receive from us will be encrypted using Transport Layer Security (TLS).

You are responsible for maintaining the confidentiality of your account credentials and should not disclose your password to others. We will not ask you to disclose your password by email or telephone.

However, please note that data transmission over the Internet is inherently insecure, and any information disclosed online can potentially be collected and used other than by the intended recipient. As such, whilst we strive to protect your information, we cannot guarantee its absolute security.

If a personal data breach occurs that is likely to affect your rights, we will notify you and the relevant authorities where applicable law requires.

(8) RETENTION

We will retain your information for as long as needed to provide you with services. If you wish to request that we no longer use your information to provide you services, please contact us. We will retain and use your information as necessary to comply with our legal obligations, to resolve disputes, and to enforce our contractual and legal rights.

When deciding how long to keep information, we consider its nature and sensitivity, the purpose for which it was collected, whether you have withdrawn consent or objected, and our legal, tax, accounting and contractual obligations. When information is no longer needed, we securely delete or anonymise it.

(9) UPDATING INFORMATION

Please contact us if your personal information we hold needs to be corrected or updated. Portal users can also update their account details directly in the customer portal.

(10) CHILDREN'S PRIVACY

Our Site and services are intended for business use and are not directed to children. We do not knowingly collect personal information from anyone under 16 [or the age of digital consent in their country]. If you believe a child has given us personal information, please contact us and we will delete it.

(11) THIRD-PARTY WEBSITES

Our Site may link to websites and services operated by third parties, including our technology partners. We are not responsible for their privacy practices and encourage you to read their privacy policies.

(12) TERMS OF USE

Please also refer to our Website Terms of Use that set forth the restrictions, disclaimers, limitations of liability, and other terms and conditions governing the use of the Network Innovations Site.

(13) CONSENT AND INFORMATION ABOUT OTHERS

Where we rely on your consent, we will ask for it clearly and separately, and you may withdraw it at any time without affecting processing carried out before withdrawal. Using the Site does not by itself constitute consent where consent is legally required.

If you give us personal information about another person, such as a colleague, you confirm that you are authorised to do so and that they have been made aware of this policy.

(14) REGIONAL PRIVACY INFORMATION

Canada. We handle personal information in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial privacy laws. You may raise concerns with our Privacy Officer and complain to the Office of the Privacy Commissioner of Canada.

European Economic Area and United Kingdom. We process personal data in accordance with the GDPR and the UK GDPR. You may complain to the data protection authority where you live or work, or where an alleged infringement occurred (in the UK, the Information Commissioner's Office).

United States. Residents of California and other states with consumer privacy laws may have rights to know, access, correct and delete their personal information, and to opt out of its sale, sharing or use for targeted advertising. We do not sell personal information [and do not share it for cross-context behavioural advertising]. We will not discriminate against you for exercising your rights, and you may use an authorised agent to make a request.

Australia. We handle personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). If you have a concern about how we handle your personal information, please contact us first at PrivacyOfficer@networkinnovations.com. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

Malaysia. We process personal data in accordance with the Personal Data Protection Act 2010.

(15) CHANGES

We may update this Privacy Policy from time to time as our information and privacy practices are modified or changed. We may also notify you of changes to our Privacy Policy by email. You should periodically review this Privacy Policy for the latest information on our practices. Material changes will be posted on this page and, where required by law, notify you directly.

(16) CONTACT US

If you have questions about this policy or wish to exercise your rights, please contact our Privacy Officer:

Email: Legal@networkinnovations.com

To report a security concern, contact security@networkinnovations.com.

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