

## Privacy Policy

Micro Logic Corporation (“MLC,” “we,” “us,” or “our”) is committed to respecting your privacy and keeping in compliance with European Union’s General Data Protection Regulation (“GDPR”) 2016/679, dated April 27th 2016. The purpose of this privacy policy of MLC (“Privacy Policy”) is to let you (“User,” “you,” or “your”) know our policies and procedures regarding the collection, use and disclosure of information through miclog.com (the “Site”), and any other websites, features, applications, widgets or online services that are owned or controlled by MLC and that post a link to this Privacy Policy, if any (hereinafter collectively with Site, referred to as the “Services”), as well as any information MLC collects outside of the Site in connection with the Services or where there are any links to this Privacy Policy. It also describes the choices available to you regarding the use of, your access to your personal information as collected by MLC, and how to update and correct the same. Note that we combine the information we collect from you from the Site, through the Service generally, and/or offline.

By accessing or using the Service(s), you thereby consent to the information collection, disclosure and use practices described in this Privacy Policy. Please note that certain features or services referenced in this Privacy Policy may not be offered as Services at all times. Capitalized terms not expressly defined herein, shall have the meaning ascribed to them in the Terms and Conditions.

### **What Information of yours will be collected by us?**

*When you use the Service(s), you may provide MLC with personal information about you. This may include, without limitation, your name and contact information, and/or financial information to make or receive payment for Services obtained through the Site or otherwise. When you use the Services, we may also collect information related to such use by you, and aggregate this with information about MLC Users (defined below), which helps MLC improve our Services for you and other MLC Users. MLC may collect the following types of personal information about you in the course of the provision of the Services and/or use of the Site by you:*

- **Personal Information:** In the course of using the Services, MLC may require or otherwise collect information that identifies the User as a specific individual and can be used to contact or identify the User (“Personal Information”). Examples of Personal Information include your name, email address, company address, billing address, and phone number.
- **Payment Information:** If the User uses the Services to make payments, MLC will also collect certain payment information of the the User, such as

debit/credit card, PayPal, bank account details or other financial account information, and billing address.

- Identity Verification: MLC may also collect Personal Information, such as the User's date of birth and/or the User's passport / national identification number / company registration number, to validate the User's identity or as may be required by law or for contractual formalities. MLC may request documents to verify this information, including without limitation, a copy of the User's government-issued identification or certificates of registration.
- Minors: The Services are intended for MLC Users 18 and older. MLC does not knowingly collect Personal Information from anyone under the age of 18. If MLC becomes aware that a child younger than 18 years of age has provided MLC with Personal Information, we shall use all commercially reasonable efforts to delete such information from MLC's files. If you are the parent or legal guardian of a child younger than age 18 and believe that MLC has collected Personal Information from your child, please contact us at: <https://www.miclog.com/contact-us/>.
- Non-Identifying Information/Username: MLC also may collect other information, such as postal codes, demographic data, information regarding the User's use of the Services, and general preference-related data ("Non-Identifying Information"). MLC may aggregate information collected from MLC registered and non-registered users of the Services ("MLC Users").

*MLC's third party payment processor shall render some Personal Information (but not all) into a form of Non-Identifying Information referred to in this Privacy Policy as "Hashed Information." This is typically accomplished using a mathematical process (commonly known as a randomized hash function) using a randomly generated number to convert information into a code to protect the User's security. The code does not identify the User directly, but it may be used to connect the User's activity and interests to such code. When Non-Identifying Information is combined with Personal Information, then MLC shall treat such Non-Identifying Information as follows:*

- **Combination of Personal and Non-Identifying Information:** Certain Non-Identifying Information would be considered a part of the User's Personal Information if it were combined with other identifiers in a way that enables the User to be identified (e.g. combining postal code with information with the User's name). But the same pieces of information are considered Non-Identifying Information when they are taken alone or combined only with other non-identifying information (e.g. combining postal code with the User's viewing preferences). MLC may combine the User's Personal Information with Non-Identifying Information, but MLC shall then treat the combined information as Personal Information.

### **When do we collect personal data about you?**

- When you are using MLC's Site and/or Services.

- When you interact with us in person, through written correspondence, by phone, or via social media.
- When we collect Personal Information from other third-party legitimate sources, such as third-party data aggregators, public sources, or social networks. When your Personal Information is collected through such third-party source, it will still be handled by MLC in accordance with this Privacy Policy.
- We may collect Personal Information if it is considered to be of legitimate interest, and if this interest is not overridden by your privacy interests. Before data is collected we make sure an assessment is made, ensuring that there is an established mutual interest between you and MLC.

## **Why do we collect and use Personal Information?**

We collect and use Personal Information mainly to perform direct sales, direct marketing and customer service to our customers. We also collect data about suppliers and vendors for the Services, potential partners, and persons seeking a job or working in MLC.

We may use your Personal Information for the following purposes:

- Send you marketing communications which you have requested. These communications may include information about our Products/Parts and/or Services, events, activities. Communications are subscription based and requires your consent.
- Send you information about the Products/Parts and/or Services that you have purchased from us.
- Perform direct sales activities in cases where legitimate and mutual interest is established.
- Provide you content and venue details on a webinar or event you signed up for.
- Reply to a ‘Contact me’ or other web forms you have completed on the Site (e.g. to download a whitepaper).
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide access to our Order Status web page on our Site.
- Perform contractual obligations, including without limitation, Order confirmation, license details, invoice, reminders, etc.
- Notify you about any disruptions to our Services (system messages).
- Contact you to conduct surveys about your opinion on our Products/Parts and Services.
- Process a job application.

## **Our legal basis for collecting Personal Information**

### **Collecting Personal Information based on consents**

The collection of Personal Information based on your consent, where applicable, will be done by using “Consent Forms” that will store documentation related to the consent you give. Individual consents will always be stored and documented in our systems.

### **Collecting Personal Information based on Orders and agreements**

We use Personal Information for fulfilling our obligations related to Orders and agreements with MLC Users, partners and suppliers.

### **Collecting Personal Information based on legitimate interest**

We may use Personal Information if it is considered to be of legitimate interest, and if the privacy interests of the User do not override this legitimate interest from such usage. Normally, to establish the legal basis for data collection, an assessment is made during which a mutual interest between MLC and the User has been identified. This legal basis is primarily related to MLC’s sales and marketing purposes.

### **What Personal Information of yours is collected automatically by us?**

*MLC also receives technical information when MLC Users utilize the Services. MLC uses this technical information to analyze how MLC Users utilize the Services, to improve how the Site functions, save login information of the MLC Users for future sessions, serve the MLC Users with advertisements of potential interest to them.*

MLC and our third-party service providers (including, without limitation, our analytics and third party content providers), may automatically collect certain information from the User whenever the User accesses or interacts with the Services, which may include without limitation *inter alia* (1) the browser and operating system being using; (2) the URL or advertisement that referred the User to the Services; (3) any search terms entered by the User into a search engine that led the User to the Services; (4) areas within the Services that the User visited; and (6) other information commonly shared when browsers communicate with websites. MLC may combine this automatically collected log information with other information MLC collects about the User, in order to improve the Services, marketing, analytics, and Site functionality.

The information MLC collects also includes the Internet Protocol (“**IP**”) address or other unique device identifier (“**Device Identifier**”) for any device (computer, mobile phone, tablet, etc.) used to access the Services. A Device Identifier is a number that is automatically assigned or connected to the device used by the User to access the Service, and MLC servers identify the User’s device by its Device Identifier. Mobile service providers may also provide MLC or our third-party service providers with information regarding the physical location of the device used by the User to access the Service.

*MLC and its partners use cookies or similar technologies to analyze trends, administer the website, track users’ movement around the website, and to gather demographic*

*information about the MLC User base as a whole. The technology used to collect Personal Information automatically from MLC Users may include the following:*

- **Cookies:** MLC, and our marketing partners, Affiliates, analytics, and service providers use Cookies to collect information. A “Cookie” is a small data file that MLC transfers to the User’s computer’s hard disk for record-keeping purposes. We use both persistent Cookies that remain on the User’s computer or similar device (e.g. as to save the User Account registration ID and login password for future logins to the Services and to track the User’s compliance with the Terms and Conditions), and session ID Cookies, which expire at the end of User’s browser session (e.g. to enable certain features of the Services, to better understand how the User and other MLC Users interact with the Services and to monitor aggregate usage by the User and other MLC Users and web traffic routing on the Service). The User can control the use of Cookies at the individual browser level, but if the User chooses to disable Cookies, it may limit the use of certain features or functionality of the Site and/or Services.
- **Web Beacons:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as “web beacons” and/or “tracking tags” to help us keep track of what content on our Service is effective and to serve relevant advertising to you. Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or email messages you receive. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Service, to monitor how the User navigate the Service, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed.
- **Embedded Scripts:** We and our marketing partners, Affiliates, analytics, and service providers may also employ Embedded Script software technology, which is programming code designed to collect information about the User’s interactions with the Services, such as the links clicked on by the User. This code is temporarily downloaded onto the User’s computer or other device and is deactivated or deleted when the User disconnects from the Services.

**Miscellaneous:** In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

## Do Not Track Signals

MLC Users’ browser settings may allow them to automatically transmit a “Do Not Track” signal to any websites visited, but MLC does not alter its practices when it receives a “Do

Not Track” signal from a visitor’s and User’s browser. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## What Personal Information is not collected by us?

MLC does not collect any data that refers to or includes details about the User’s race, ethnicity, religious or philosophical beliefs, sexual history / preferences / orientation, political affiliations / opinions, trade union memberships, health, genetic, and biometric data, or criminal convictions and offences.

## **How long do we keep your Personal Information?**

*MLC uses information collected through the Services to provide and improve the Services, process User requests, prevent fraud, provide the User with information and advertising of potential interest, comply with the law, and as otherwise permitted with the User’s consent.*

### MLC USES THE USER’S INFORMATION COLLECTED:

- To provide and improve the Services, complete the User’s transactions, and address the User’s inquiries, process the User’s registration, verify the information provided by the User is valid, and for compliance and internal business purposes;
- To contact the User with administrative communications and MLC newsletters, marketing or promotional materials (on behalf of MLC or third parties) and other information that may be of interest to the User;
- To tailor content MLC displays to the User and offers MLC may present to the User, both on the Service and elsewhere online;
- To administer and develop MLC’s business relationship with the User;
- To enforce and comply with the law, including to conduct an investigation, to protect the property and rights of MLC or a third party, to protect the safety of the public or any person, or to prevent or stop activity that MLC may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity. MLC may also use Device Identifiers to identify MLC Users; and
- For any other purposes as may be notified to the User at the time the User provides the information, subject to the User’s consent, and in accordance with this Privacy Policy.

UNLESS THE USER REQUESTS THAT MLC DELETE CERTAIN INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY, MLC RETAINS THE INFORMATION COLLECTED FOR AT LEAST 6 YEARS BEYOND THE USER’S TERMINATION OF THE AGREEMENT AND RELATIONSHIP WITH MLC, AND MAY RETAIN THE INFORMATION FOR AS LONG AS NEEDED FOR MLC’S BUSINESS AND LEGAL PURPOSES. MLC MAY RETAIN CERTAIN INFORMATION WHICH THE USER HAS REQUESTED TO BE DELETED FOR AS LONG AS NECESSARY IF REQUIRED UNDER THE APPLICABLE LAWS OR ORDERED TO DO SO BY ANY COMPETENT GOVERNMENT AND/OR REGULATORY AUTHORITY.

We may process Personal Information for statistical purposes, but in such cases, the Personal Information shall be anonymized.

## **Do we share your data with anyone?**

We do not share, sell, rent, or trade your information with any third parties without your consent, except from what is described below:

### **Third-party Service Providers working on our behalf:**

MLC may employ third party companies, subcontractors, distributors, suppliers and individuals to facilitate Services, to provide the Services on MLC's behalf, to perform Service-related services (e.g., without limitation, maintenance services, database management, web analytics, payment processing, fraud detection and improvement of MLC's features) or to assist MLC in analyzing how the Services are used. These third parties may have access to the User's Personal Information in order to perform these tasks on MLC's behalf. The User hereby consents to MLC's grant of such access to the User's Personal Information, as a necessary component in enabling MLC to provide the User the Services and fulfil MLC's contractual obligations to the User under the Terms and Conditions.

### **If required by law:**

We will disclose your personal information if required for legal or investigative purposes, or if we, as a company, reasonably believe that disclosure is necessary to protect our company's rights and/or to comply with a judicial proceeding, court order or legal process, or in connection with or if MLC is part of a merger or acquisition. However, we will do what we can to ensure that your privacy rights continue to be protected. MLC shall make disclosures of your Personal Information (to the extent required by the law) under the following circumstances:

- **Legal and Investigative Purposes:** MLC will share information with government agencies as required by law in response to lawful requests by public authorities, including to meet national security or law enforcement requirements and, including without limitation, in connection with reporting earnings. MLC cooperates with government and law enforcement officials and private parties to enforce and comply with the law. MLC shall disclose information about the User to government or law enforcement officials or private parties as MLC, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), at the request of governmental authorities or other third parties conducting an investigation, to protect the property and rights of MLC or a third party, to protect the safety of the public or any person, or to prevent or stop activity MLC may consider to be, or to pose a risk of being, illegal, fraudulent, unethical or legally actionable activity. MLC may also use Device Identifiers to

identify the User and other MLC Users, and may do so in cooperation with third parties at our discretion.

- **Internal and Business Transfers:** MLC may share information, including Personal Information, with any parent company, subsidiaries, and affiliates, primarily for business and operational purposes. MLC may sell, transfer or otherwise share some or all of our assets, including the User's Personal Information, in connection with a merger, acquisition, reorganization or sale of assets (including, in each case, as part of the due-diligence process with any potential acquiring entity) or in the event of bankruptcy. The User shall be notified via email and/or a prominent notice on our website of any change in ownership or uses of the User's Personal Information, as well as any choices the User may have regarding Personal Information.

**User Receiving Information From Third Parties or Requesting That MLC Share User's Information:**

The User may be presented with an opportunity to receive information and/or marketing offers from one or more third parties. If you agree at that time to have your Personal Information shared, the same shall be disclosed to that third party (or parties) and will be subject to the privacy policy and practices of that third party. MLC is not responsible for the privacy policies and practices of third parties, and, if the User later decides to no longer receive communications from a third party, the User will need to contact that third party directly.

**We may also share your Non-Identifying Information with third parties:**

MLC may share aggregated Non-Identifying Information and we may otherwise disclose Non-Identifying Information (including, without limitation, Hashed Information) to third parties. MLC does not share the User's Personal Information with third parties for those third parties' marketing purposes unless MLC first provides the User with the opportunity to opt-in to or opt-out of such sharing. We may also share the information we have collected about you, including Personal Information, as disclosed at the time you provide your information, with your consent, as otherwise described in this Privacy Policy, or in the following circumstances:

**Third party analytics providers, ad servers and similar third parties:**

*MLC may work with advertising agencies and vendors who use technology to help MLC understand how people use the Site. These vendors may use technologies to serve the User advertisements of potential interest. The User hereby consent to receive such advertisements under this Privacy Policy and by consenting to the Terms and Conditions, and can choose to opt out of receiving interest-based advertising.*

MLC works with (or may in the future work with) network advertisers, ad agencies, analytics service providers and other vendors to provide us with information regarding traffic on the Services, including pages viewed and the actions taken when visiting the Site; to serve our advertisements on other web sites, within mobile apps and elsewhere



online; and to provide MLC with information regarding the use of the Site and Services and the effectiveness of MLC's advertisements. MLC's service providers may collect certain information about the User visits to and activity on the Services as well as other websites or services, they may set and access their own tracking technologies on the User's device (including Cookies and web beacons), and may use that information to show the User targeted advertisements. Some of these parties may collect Personal Information when you visit the Site. We may also share certain Non-Identifying Information with these parties, including Hashed Information, in connection with the services they provide to MLC. The User hereby consents, acknowledges and accepts to such collection of the User's information by these third-parties for the purposes of utilizing the Services, and in order to enable MLC to carry out its contractual obligations towards the User as outlined in the Terms and Conditions. If the User wishes to opt out of interest-based advertising, then the User shall click on the corresponding Unsubscribe link. If the User chooses to opt out, the User may still continue to receive generic ads.

## You're Rights and Choices, and How to Opt-Out

### Opt-Out

Users may update their choices regarding the types of communications received from MLC through clicking "Unsubscribe" in any email communication received by the User from MLC. The User also may opt-out of receiving marketing emails from MLC by following the opt-out instructions provided in those emails. Please note that MLC reserves the right to send the User certain communications relating to the User's Account or use of the Site and/or Services (for example, administrative and Service announcements) via email and other means and these transactional Account messages may be unaffected if the User opts-out from receiving marketing communications. Users who access the Site and/or Service by using an MLC mobile application may, with permission, receive push notifications. Similarly, registered Users who access the Site and/or Services by using certain desktop browsers may, with permission, receive push notifications. Notification preferences can be modified in the settings menu for the mobile application or the applicable browser.

Changing your Personal Information or closing your Account:

*The User may request access to all Personal Information MLC has about the User, and/or may delete the User's Account and/or request deletion of all Personal information MLC has about the User. MLC shall honor such request to the extent reasonably possible, but some information may remain on the Site, such as information the User posted publicly (e.g. testimonials).*

The User is responsible for maintaining the accuracy of the Personal Information submitted to MLC, such as the User's contact information. The User may access, correct, or request deletion of Personal Information by making updates to that information or by contacting MLC through the Site. If the User requests to access all Personal Information submitted,

MLC shall respond to such request to access within 30 days. If the User completely deletes all such information, then the User's Account may become deactivated. If the Account is deactivated or the User requests to close the Account, the User shall no longer be able to use all of the Site or the Services. While MLC endeavors to use all commercially reasonable efforts to honor the User's request to delete all of the User's information; however, certain information may persist on the Services even if the User closes the Account. In addition, the User's Personal Information may remain in MLC's archives and information the User updates or deletes, or information within a closed Account, may persist internally or for MLC's administrative purposes. It is not always possible to completely remove or delete information from MLC's databases. In addition, MLC typically will not remove information that the User posted publicly through or on the Services. Bear in mind that neither the User nor MLC can delete all copies of information that has been previously shared with others on the Services.

## **Security**

MLC takes commercially reasonable steps to help protect and secure the information it collects and stores about the User. But the User hereby agrees, accepts and acknowledges that NO method of transmission over the Internet, or method of electronic storage, is 100% secure. Thus, while we strive to protect your personal data, MLC cannot ensure and does not warrant the security of any information you transmit to us.

## **International Transfers of Personal Information**

MLC is a corporation organized under the laws of the State of New Jersey of the United States of America (U.S.). If a User is located outside the U.S. and chooses to provide information to us, MLC transfers Personal Information to the U.S. for processing. The U.S. may not have the same data protection laws as the country/jurisdiction in which the User initially provided the information. When MLC transfers the User's information to the U.S., such information shall be protected as described in this Privacy Policy. By visiting the Service, or providing MLC with any information, the User fully understands and unambiguously consents to this transfer, processing and storage of your Personal Information in the United States of America.

MLC protects personally identifiable information from residents of the European Union, other European Economic Area countries, in accordance with applicable law.

## **Link to Other Sites**

The Services may contain links to other websites. If the User clicks on a third-party link, that User shall be directed to that third party's website. The User hereby acknowledges and agrees that MLC's link to a website is not to be considered or deemed as an endorsement, authorization or representation of MLC's affiliation with that third-party, nor is it an endorsement of their privacy or information security policies or practices. MLC does not exercise control over third-party websites, which may place their own cookies

or other files on the User's computer, collect data or solicit Personal Information from the User. We encourage the User to read the privacy policies or statements of the other websites the User visits.

### **Changes to this Privacy Policy**

If we make changes that significantly alter our privacy practices, we will notify you by email or post a notice on our websites prior to the change taking effect.

*We may change this Privacy Policy. If we make material changes, we will provide notice.*

MLC may update this Privacy Policy at any time and any changes will be effective upon posting this updated Privacy Policy on the Site. In the event that there are material changes to the way MLC treats Personal Information, MLC shall display a notice through the Services prior to the change becoming effective, and may also notify the User by email, in MLC's sole discretion. However, MLC shall use the User's Personal Information in a manner consistent with the Privacy Policy that was in effect at the time the User submitted such information, unless the User consents to the new or revised policy. Consent of the new or revised Privacy Policy shall be deemed effective upon any continued use of the Services by the User.

### **Contacting MLC**

If you have any questions or concerns about this Privacy Policy, please contact us via <https://www.miclog.com/contact-us/>; or by mail addressed to Micro Logic, Attn: Privacy Policy Manager, 31 Industrial Ave., Mahwah, NJ 07430.

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