

Privacy Notice

Simetry (herein, "Simetry", "we", "us" and "our") respects your concerns about privacy. Simetry is responsible for the processing of your personal data, which generally is the entity that obtains your personal data.

Personal data are all information relating to an identified or identifiable natural person. This includes information such as your name, age, address, telephone number, date of birth, e-mail address, IP address or user behavior. Information that cannot (or only with a disproportionate effort) be referred to your person, e.g. by anonymizing the information, is not personal data.

This Privacy Notice applies to the personal data we obtain through the Simetry's properties, including websites, mobile applications and social media pages that reference this Privacy Notice ("Online Channels"); offline collection in connection with sales, marketing, partner and supplier engagement ("Offline Channels"); and third-party sources, including ad networks and lead brokers (collectively, the "Channels"). This Privacy Notice does not apply to personal information obtained through our Careers website or to products and services that post separate privacy policies.

This Privacy Notice describes the types of personal data we obtain through the Channels, how we may use that personal data, with whom we may share it, and how you may exercise your rights regarding our processing of the information. The Privacy Notice also describes the measures we take to safeguard the personal data we obtain and how you can contact us about our privacy practices.

The Online Channels may provide links to other third-party websites and features, or contain third-party cookies, that are not owned or controlled by Simetry. Please review the privacy policies of these third parties to familiarize yourself with their practices.

Personal Data We Obtain

We may obtain personal data through the Channels. The types of personal data we may obtain include:

- Contact information (such as name, phone and fax number, email and postal address) for you or for others (e.g., principals in your business);
- Information used to create your online account (such as username, password and security question and answer);
- Biographical and demographic information (such as date of birth, age, gender, job title/position, marital status and dependent, spouse and other family information);
- Purchase and customer service history;
- Financial information (such as payment information, including name, billing address and payment card details (i.e., card number, expiration date and security code); bank account information; financial statements; income; and credit score);
- Location data (such as data derived from your IP address, country and zip code) and the precise geolocation of your mobile device where we have provided notice and choice, as appropriate;
- Contact information you provide about friends or other people you would like us to contact;
- Clickstream data and other information about your online activities (such as information about your devices, browsing actions and usage patterns), including across the Online Channels and third-party websites, that we obtain through the use of cookies, web beacons and similar technologies (see our Cookie Consent Tool); and
- Other personal data contained in content you submit to us.

In addition, in connection with some of our products and services, we may obtain government-issued ID numbers and Tax ID numbers.

We use third-party web analytics services in connection with the Online Channels, including Google Analytics, Adobe Analytics and Marketo, which use cookies and similar technologies to collect data (such as IP addresses) to evaluate use of and interaction with the Online Channels. (You may learn about Google's advertising features, including Google Analytics' currently available opt-out mechanisms, here. To learn more about these and other analytics services and how to opt out, please view our Cookie Consent Tool here).

Please note that providing personal data to us is voluntary on your part. If you choose not to provide us certain information, we may not be able to offer you certain products and services, and you may not be able to access certain features of the Online Channels.

Cookies and Similar Technologies

Like most companies, Simetry uses cookies and similar technologies ("cookies") on our websites to personalize and enhance your experience on our sites.

How We Use Cookies

Cookies contain small amounts of information which are downloaded to your device when you visit our website. Cookies are sent back to our website to allow us to recognize your device.

Essential Cookies allow us to recognize your device to help you navigate efficiently to obtain the information and services you have requested.

Analytical and Customization Cookies allow our site to remember your preferences such as language selection and help you to view information that is most relevant to your interests; these cookies also help us to maintain and improve our websites by providing information on how visitors find and use the sites and how well the sites are performing.

Advertising Cookies may be used in some cases to make advertising messages more relevant to you.

Unless you disable the cookies on our website, by using our website you agree to our use of those cookies.

Making Cookie Choices

You may see the list of Simetry and selected partner cookies on our website and make choices about those cookies by visiting our Cookie Consent Tool, by clicking on "Cookies" at the bottom of the page for the cookie preferences you are interested in managing. In addition to our Cookie Consent Tool, most browsers allow you to manage cookie preferences. If you decide to disable cookies on our site, you may not be able to take full advantage of all our website features once you have done so. Except for cookies that are essential to the operation of this website (Essential Cookies), you may make choices about the cookies on this website. Please note that if you choose to manage cookies on our websites, the Tool will place a cookie on your device to allow your choices to be honored.

Sharing Tools

To enhance your experience on our websites, we sometimes embed content and sharing tools from other third-party sites, such as "like" buttons from social networking sites; these third-party sites may also place and access cookies on your device. Simetry does not control the placement or access of these third-party cookies. The third parties can be found in our Cookie Consent Tool. Please review the privacy policies of these third parties to familiarize yourself with their practices. You may exercise choices regarding third-party cookies using our Cookie Consent Tool by clicking on "Cookies" at the bottom of the page for the cookie preferences you are interested in managing.

How We Use Personal Data

We may use the personal data we obtain to:

- Provide and administer our products and services;
- Process and fulfill orders and keep you informed about the status of your order;
- Communicate about and administer our products, services, events, programs and promotions (such as by sending alerts, promotional materials, newsletters and other marketing communications);
- Conduct and facilitate surveys, sweepstakes, contests, focus groups and market research initiatives;
- Perform data analytics (such as market research, trend analysis, financial analysis and customer segmentation);
- Engage in ad retargeting and evaluate the effectiveness of our marketing efforts (including through our participation in ad networks);
- Provide customer support;
- Process, evaluate and respond to requests, inquiries and applications;
- Create, administer and communicate with you about your account (including any purchases and payments);
- Administer and register participants in our courses;
- Provide investor services;
- Conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- Operate, evaluate and improve our business (such as by administering, enhancing and improving our products and services; developing new products, services and Online Channels; managing our communications and customer relationships; and performing accounting, auditing, billing, reconciliation and collection activities);
- Verify your identity and protect against and prevent fraud and other unlawful activity, unauthorized transactions, claims and other liabilities, and manage risk exposure and quality;
- Conduct investigations and comply with and enforce applicable legal requirements, relevant industry standards, contractual obligations and our policies and terms (such as this Privacy Notice and other Online Channels terms of use); and
- Maintain and enhance the safety and security of our products, services, Online Channels, network services, information resources and employees.

We may combine personal data we obtain through Online Channels with information we obtain through Offline Channels, as well as other information, for the purposes described above. We may anonymize or aggregate personal data and use it for the purposes described above and for other purposes to the extent permitted by applicable law. We also may use personal data for additional purposes that we identify at the time of collection. We will obtain your consent for these additional uses to the extent required by applicable law.

Where required by applicable law, we will obtain your consent for the processing of your personal data for direct marketing purposes.

The legal basis for Simetry processing your personal data as described above will typically be one of the following:

- Your consent;
- Performance of a contract with you or a relevant party;
- Our legitimate business interests; or
- Compliance with our legal obligations.

Personal Data Sharing

We do not sell or otherwise disclose personal data about you except as described here or at the time of collection.

- We may share personal data within Simetry for the purposes described in this Privacy Notice and ensure that appropriate safeguards are in place throughout the company.
- We may share personal data with service providers we have retained to perform services on our behalf (such as payment processing, order fulfillment, customer support and data analytics). These service providers are contractually required to safeguard the information provided to them and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements.
- We may share personal data with our joint marketing partners and other business partners for the purposes described in this Privacy Notice.
- We may disclose personal data about you (1) if we are required or permitted to do so by applicable law or legal process (such as a court order or subpoena); (2) to law-enforcement authorities or other government officials to comply with a legitimate legal request; (3) when we believe disclosure is necessary to prevent physical harm or financial loss; (4) to establish, exercise or defend our legal rights; (5) in connection with an investigation of suspected or actual fraud or illegal activity or (6) otherwise with your consent.
- We reserve the right to transfer to relevant third parties any information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation) or other business combination. In such case, we will require the relevant third parties to provide comparable levels of protection as Simetry provides with respect to the information we share.

Data Transfers

We may transfer the personal data we collect through the Channels to, and store such data in, other countries, including the U.S., which may have different data protection laws than the country in which the information was provided. If we do so, we will transfer the personal data only for the purposes described in this Privacy Notice. To the extent required by applicable law, when we transfer your personal data to recipients in other countries, we will take measures to protect that information by appropriate safeguards such as the European Standard Data Protection Clauses.

Your Choices

We offer you certain choices in connection with the personal data we obtain about you. To update your preferences, limit the communications you receive from us or submit a request, please contact us as specified in the "How to Contact Us" section of this Privacy Notice.

To the extent provided by the law of your jurisdiction, you may have the right to (1) access certain personal data we maintain about you; (2) request that we update, correct, amend, erase or restrict your personal data; or (3) exercise your right to data portability. Where provided by law, you may withdraw consent you previously provided to us or object at any time to the processing of your personal data on legitimate grounds relating to your particular situation, and we will apply your preferences going forward as appropriate. To request to exercise these rights, please contact us as indicated in the "How to Contact Us" section of this Privacy Notice.

For more information with regard to the European General Data Protection Regulation (GDPR) or California's "Shine the Light" law, please see the "Additional Information" section.

To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal data that we maintain. Depending on your location, you may have the right to file a complaint with a government regulator if you are not satisfied with our response.

How We Protect Personal Data Transmission

We maintain administrative, technical and physical safeguards, consistent with legal requirements where the personal data was obtained, designed to protect against unlawful or unauthorized destruction, loss, alteration, use or disclosure of, or access to, the personal data provided to us through the Channels.

Retention of Personal Data

To the extent permitted by applicable law, we retain personal data we obtain about you as long as (1) it is needed for the purposes for which we obtained it, in accordance with the provisions of this Privacy Notice or (2) we have another lawful basis, stated in this Privacy Notice or at the point of collection, for retaining that information beyond the period for which it is necessary to serve the original purpose for obtaining the personal data.

Additional Information:

European General Data Protection Regulation

This Privacy Notice takes into account the requirements set out by the European Data Protection Regulation (GDPR). As mentioned above under "Your Choice," you may exercise certain rights. In case you are a European citizen, the following rights specifically apply to you:

- According to Art. 15 GDPR, you can request information about your personal data processed by us.
- In particular, you may obtain information about the purposes of processing, the categories of personal data, the categories of recipients to whom your data have been or will be disclosed, the planned storage period, the existence of a right to correction, deletion, restriction of processing or objection, the right to lodge a complaint with a supervisory authority, the origin of your data, if not collected from us, about transfer to third countries or international organizations, and the existence of automated decision-making, including profiling and, where applicable, meaningful information about the logic involved.
- According to Art. 16 GDPR, you can immediately demand the correction of incorrect data or the completion of your personal data stored with us.
- According to Art. 17 GDPR, you may request the deletion of your personal data stored by us, provided that the processing is not necessary to exercise the right to freedom of expression and information, to fulfil a legal obligation, for reasons of public interest or to assert, exercise or defend legal claims.
- According to Art. 18 GDPR, you can request the restriction of the processing of your personal data if you contest the accuracy of the data, if the processing is unlawful, if we no longer need the data and if you refuse their deletion because you need to establish, exercise or defend legal claims. You are also entitled to the right under Art. 18 GDPR if you have objected to the processing in accordance with Art. 21 GDPR.
- According to Art. 20 GDPR, you may request that the personal data you have provided us with be received in a structured, current and machine-readable format or you may request that it be transmitted to another person responsible.
- According to Art. 7 para. 3 GDPR, you can withdraw your consent at any time. As a consequence, we are no longer allowed to continue the data processing based on this consent for the future.
- According to Art. 77 GDPR, you have the right to complain to a supervisory authority. You can contact the supervisory authority of your habitual residence, place of work or place of the alleged infringement.

Notice to California Residents

Subject to certain limits under California law, California residents may ask us to provide them with (1) a list of certain categories of personal data we have disclosed to third parties for their direct marketing purposes during the immediately preceding calendar year and (2) the identity of those third parties. To obtain this information, please send an email to webmaster@simetry.com with "California Shine the Light Privacy Request" in the subject line and in the body of your message.

Children's Personal Data

The Online Channels are designed for a general audience and are not directed to children under the age of 13. We do not knowingly collect or solicit personal data from children under the age of 13 through the Online Channels. If we become aware that we have collected personal data from a child under the age of 13, we will promptly delete the information from our records. If you believe that a child under the age of 13 may have provided us with personal data, please contact us as specified in the "How to Contact Us" section of this Privacy Notice.

Changes to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our information practices taking into current legal requirements. We will indicate at the bottom of this Privacy Notice when it was most recently updated.

How to Contact Us

If you have any questions or comments about this Privacy Notice write to us at:

Attn: Privacy
webmaster@simetry.com