

Privacy Notice

Effective November 2023

11:11 Systems respects your privacy and is committed to maintaining processes aimed at protecting the privacy and confidentiality of the personal data we collect. The purpose of our Privacy Notice is to describe our data privacy practices, including for persons who provide personal data to 11:11 Systems and its affiliates (collectively, “11:11 Systems” or “we” or “our”). This Privacy Notice describes the ways we may collect, use, disclose, and otherwise process information from and about you.

If you are a resident of California, please also refer to the “Additional Privacy Information for California Residents” section below, for further information, including about the categories of personal information we collect and your rights under California privacy laws.

If you are a resident of the European Economic Area (EEA) or the UK or doing business with a 11:11 Systems group entity headquartered in the EEA or the UK, please also refer to the “Additional Privacy Information for EEA/UK” section below for further information, including about how we use personal information and your rights under EEA and UK data protection laws.

For purposes of this Privacy Notice, the term “visitor” includes both those who are and those who are not current customers of our products or services, whether you upload information to our websites, download it, or are merely visiting our websites, as well as those who interact with us through other means, including other online services (e.g., e-mail, chat), by phone, text messages, fax, by written correspondence or in person. You can choose not to provide certain information when using our websites or interacting with us, but then you might not be able to take advantage of many of our website features or otherwise transact with us.

SCOPE

Except as otherwise noted below, this Notice applies to personal data that 11:11 Systems processes as a controller or business related to:

- Users of our website where this Notice is posted and the services we provide through the website, payment services provided through the online customer console, other services provided by us that display or include a link to this Notice, and in conducting our business activities (collectively, our “Products and Services”);
- Current, former, and prospective customers, vendors, and partners;
- Individuals who subscribed to receive news, information, and marketing communications from us; and
- Individuals who communicate with us or otherwise engage with us related to our Services.

Not in Scope. This Notice does not apply to the personal data that we collect and process about 11:11 Systems employees and personnel or job applicants and candidates. In addition, this Notice does not apply to the extent we process personal

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data, as a processor or service provider, on behalf of our customers (“Customer Content”) when providing our Products and Services (such as Infrastructure as a Service (“IaaS”), Private Cloud, IaaS Backup, Disaster Recovery as a Service (“DRaaS”), Backup as a Service (“BaaS”), Object Storage, and Managed Security Services). Our processing of Customer Content is subject to the terms of our contracts with each customer, who is the controller and business for the Customer Content that we process on their behalf.

1. WHAT DO WE COLLECT AND WHERE?

The information we collect may include:

Identity and Contact Data: your personal or company information, such as your name, contact information, company names and addresses, related inquiry information, username and password for website registration and login, account number, user/member ID, and financial information. Identity and Contact Data is generally required to provide Products and Services. If you do not provide us requested Identity and Contact Data, we may not be able to respond to your inquiry or request, or perform contract obligations we may have to you or your employer or principal.

Technical and Device Data. We may also collect IP addresses, device type, operating system, advertising ID, referring URL, general location information, hostnames, and other log file information (described below), electronic or telephone communications, product and service selections and orders, or other activities.

Generally, we may collect information about you in the following manners:

- *From you directly.* You may provide your personal information to us via chat, email or other written correspondence, telephone calls, web-based forms, by purchasing a managed service, or by other means.
- *Automatically.* We use automated technical means to collect information about your use of our Services for example by use of cookies and other tracking technologies.
- *From third party providers.* We may collect information about you from third party sources such as marketing partners or other third parties.
- 11:11 Systems affiliates located in the EEA or UK may provide 11:11 Systems with personal information about their prospective or current customers.

Managed Security Services

When a customer purchases Managed Security Services from 11:11 Systems, we will have access to potentially personal information in the form of hostnames, IP addresses, usernames, and any unencrypted data transmitted in raw log file format. We only access this information as a processor or service provider, on behalf of our customers. 11:11’s Security Operations Center (“SOC”) will store, transmit, and receive

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this data from you in an encrypted format, and data is not shared beyond our system boundaries defined as the requirements to deliver the Managed Security Service within the customer's contract. Service reports, while not encrypted from within the Console, require user authentication to access. It is our customer's responsibility to manage all Console user accounts and to whom credentials are provided.

Web Visit

You may visit our website in any of the following ways:

- Using your browser to navigate to our website 1111systems.com;
- Viewing an advertisement displayed on a third-party website that is served content by our web server; or
- Viewing an email that is served content by our or a third-party web server.

Website Interaction Data. When you visit our website, our server logs your **IP address** (unique network address), the time and duration of your visit, and the time and duration of your visit to the specific website pages you view.

If you arrive at our website by clicking a paid advertisement (including a paid search engine result) or a link in an email, then we will capture information that tracks your visit from that link. If you arrive at our website by clicking a non-paid source, such as link in a non-paid search engine result or an unsponsored link on another website, we may capture information that tracks your visit from that source to the extent we are able to do so. We may also capture information about your computer system, such as your browser type and operating system. We will likely place a cookie on your hard drive during the web visit.

Cookies and Tracking

A **cookie** is a unique alphanumeric identifier that we use to help us identify the number of unique visitors to our website, whether or not those visitors are repeat visitors, and the source of the visits.

We use necessary cookies to make our site work. Necessary cookies enable core functionality such as performance, security, network management, and accessibility.

If you do not wish cookies to be placed on your computer, then they can be disabled in your web browser. The option to do so is normally found in your browser's "security settings" section. However, please note, permanently disabling cookies in your browser may hinder your use of our website as well as other websites and interactive services.

Analytics cookies help us improve our website by collecting and reporting information on how you use it.

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A **web beacon**, also known as a web bug, a pixel tag, or a clear GIF, is a small graphic (usually 1 pixel x 1 pixel), that is embedded in a web advertisement, email, or page on our web site, but is invisible to you. When you view a page on our web site, an email or an advertisement your web browser will request the web beacon from a web server, which in turn will set a cookie in your web browser containing a unique identifier. This unique identifier will be linked to log information that is used to track your movements on our web site in order to determine the effectiveness of content and advertising campaigns. We do not collect personal information about you as part of a web visit, but web visit information may be tied to other information (including personal information) we collect from you via chat, web forms, and the other means we describe in this Privacy Notice. Our advertising agencies may also use web beacons and cookies to track your activity on our website originating from the advertisement. Our advertising agencies maintain their own privacy policies, and you should also review those.

Links to non-11:11 Systems Websites

We may provide links to third-party websites for your convenience and information. The privacy practices of those sites may differ from 11:11 Systems practices and are not controlled by 11:11 Systems and covered by this Privacy Notice. We do not make any representations about third-party websites. We encourage you to review their privacy policies before submitting your personal data.

Sensitive Information

We will not intentionally collect or maintain, and do not want you to provide, any information regarding your medical or health condition, race or ethnic origin, political opinions, religious or philosophical beliefs, or other sensitive information.

Children's Online Privacy Protection

Our services are not designed for or directed to children under the age of 16, and we will not intentionally collect or maintain information about anyone under the age of 16. If you believe or suspect that we have collected information for a child under the age of 16 please contact us at compliance@1111systems.com immediately so that we may delete it.

2. WHAT DO WE USE THIS INFORMATION FOR?

Personal Information

We may use your information to process your service requests, handle orders, deliver products and services, facilitate the processing of payments by third party service providers, provide after-sales support and customer service, communicate with you about orders, provide access to secure areas of the website, recommend Products and Services that might be of interest to you, personalize your visit to our website, administer surveys and questionnaires for market research or member satisfaction

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purposes, and enable us to review develop and continually improve the Products and Services we provide online. We also use this information to prevent or detect fraud or abuses of our website; comply with the law and our legal obligations; respond to legal process and related to legal proceedings; to consider and implement mergers, acquisitions, reorganizations, bankruptcies, financings and other business transactions; and the administration of our general business, accounting, auditing, compliance, recordkeeping, and legal functions.

We limit the use of personal information to the purposes identified in this Notice and for which the individual has provided implicit or explicit consent (to the extent permitted or required by applicable law).

We retain personal information for only as long as necessary to fulfill the stated purposes or as required by law or regulations and thereafter appropriately dispose of such information.

Contact Information

We use visitor and other contact information to send information about our company to visitors and potential customers, and to get in touch with them when necessary. We also use visitor information to respond to visitors' inquiries on our website. Visitors are given the choice at the point when we request their information.

Financial Information and payment card details

We may ask visitors to enter credit card or financial account information in order to process orders for Products or Services placed with 11:11 Systems or its affiliates. This financial information that you provide via our online customer console is then transferred over a secure connection to our payment providers. We collect this information on a transaction-by-transaction basis and will not authorize the release of the information with anyone not directly involved in processing the transaction. This information may be encrypted and stored for logging purposes in accordance with applicable requirements. Credit card numbers are used only for processing payments and are not used for any other purposes. We use payment providers for credit card processing services, and we enter into written agreements with such payment providers to ensure appropriate security and confidentiality measures are in place in safeguarding your personal data.

We use web visit information to measure interest in and develop our web pages and marketing plans, customize the content you view on your web visits based on your activity on past visits, and administer our website.

We use the visitors' IP address to help diagnose problems with our servers, and to administer our website.

We use cookies to help us recognize visitors as unique visitors (with a number) when they return to our websites. For example, if there are 1,000 visits to our website

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on a certain day, we can use cookies to discover how many of those visits were made via the same browser (same visitor). We may also use the cookie to discover whether a certain visitor has visited our site more than once, and the source for each visit. We also use cookies to: allow us to tailor content or advertisements to match your preferred interest; avoid showing visitors the same advertisements repeatedly; compile aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website (we cannot identify visitors personally in this way); count the number of users of our sites. For information on how to prevent cookies from being installed, please reference the “Web Visit” section of this document.

We use web beacons to count the number of times that our advertisements and web-based email content are viewed. We combine web beacon information with cookies to track activity on our website originating from advertisements and web-based email content.

In addition, we may use technologies similar to cookies and web beacons that store information in your browser or device utilizing local shared objects or local storage, such as flash cookies, HTML 5 cookies, and other web application software methods.

We use information you provide to us via telephone calls, chat, email, web forms and other communications to correspond with you about services you may be interested in purchasing. If you elect to purchase a Product or Service online using a web form, we will use the information to establish your account. Information you submit in writing, such as chat, email, and web form information is archived and may be tied to information that we collect about your web visits. Your telephone call may be recorded for training purposes (with your consent, where required), and we may enter information you provide via telephone into our systems to use for the purposes described in this paragraph.

We use IP addresses, hostnames, and usernames to deliver and maintain any Managed Security Services to which a customer, or your employer has subscribed. In order to provision and support Managed Security Services, such as Managed SIEM, Continuous Risk Scanning, Managed Firewall Services, and Endpoint Detection and Response, 11:11 will receive and have access to your systems’ IP addresses, hostnames, and usernames of your company’s users. The data collected is limited to only what is required to provide the service and we only collect and access this information as a processor or service provider, on behalf of our customers.

3. DISCLOSURE OF PERSONAL INFORMATION

Personal information we gather is for internal use and will not be shared with anyone outside 11:11 Systems, except as described in this Notice, or to third party service providers to 11:11 Systems who perform functions on our behalf, but in such event,

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personal information will only be shared to the extent reasonably necessary to perform their functions and they will not be authorized to use it for any other function, or with your consent to such disclosure where required by law.

We may also disclose personal information to our affiliates, who will use and disclose this personal information consistent with this Privacy Notice.

Any information we collect from our customers or process on behalf of a business customer will be disclosed to the business customer and otherwise shared as directed by that business customer.

Service providers may include IT service providers, help desk, payment providers, analytics providers, consultants, auditors, and legal counsel. We may disclose or make available personal information to third party platforms and providers that we use to provide or make available certain features or promotions of the Services, or as necessary to respond to your requests. We may also make certain information (like aggregated browsing data) available to third parties in support of our marketing, advertising, and campaign management. Where the information is provided to enable such third party to provide services to us, the third party has agreed to use at least the same level of privacy protections described in this Privacy Notice and is permitted to use the information only for the purpose of providing services to us.

All communications of personal information to third parties will be done in a manner consistent with applicable laws and regulations, as well as our internal information security and privacy policies.

Should you breach our Global Master Services Agreement or website Terms of Use, or if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, such as a lawful request from public authorities in regard to law enforcement or national security requirements, we may disclose your information to a relevant authority. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction. In particular, we may release the information we collect to third parties when we believe it is appropriate to comply with the law, to enforce our legal rights, to protect the rights and safety of others, or to assist with industry efforts to control fraud, spam or other undesirable conduct.

We may share aggregated information derived from our Services and the personal information we collect, that does not directly identify or refer to any particular individual. We may also share de-identified information, which is no longer reasonably directly linkable to an identifiable individual, with third parties who have committed not to attempt to re-identify such data.

If we are contemplating or decide to legally transfer part or the whole of our assets to another organization, your information may be among the items transferred. The

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buyer or transferee will have to honor the commitments we have made in this Privacy Notice.

4. OPTING OUT OF COMMUNICATIONS

11:11 Systems gives you an opportunity to choose to opt-out of receiving future marketing mailings. We will not use your contact information to promote our services if you ask us not to. Please send your request to compliance@1111systems.com or write to us at 11:11 Systems, Compliance Department, 695 Route 46, Suite 301, Fairfield, New Jersey 07004. Please note that it may take up to ten days from our acknowledgement of the receipt of your request to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request.

5. SECURITY OF YOUR INFORMATION

11:11 Systems aims to safeguard and protect your personal data from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss. 11:11 Systems utilizes and maintains certain reasonable processes, systems, and technologies to do so. However, you acknowledge that no transmission over the Internet is completely secure or error-free, and that these processes, systems, and technologies utilized and maintained by 11:11 Systems are subject to compromise. Accordingly, 11:11 Systems cannot be held responsible for unauthorized or unintended access that is beyond our control.

6. INQUIRIES OR COMPLAINTS

If you have a question or complaint about this Privacy Notice or our information collection practices, please email us at Legal@1111Systems.com or write us at:

11:11 Systems, Inc.
ATTN: Legal Department
695 Route 46, Suite 301
Fairfield NJ 07004

We will investigate the matter and are committed to resolving any privacy concerns that you may have.

7. CHANGES

Our business changes constantly and our Privacy Notice may also change from time to time. You should check our website frequently to see recent changes.

This Privacy Notice was last updated on November 1, 2023

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Additional Information for California Residents

Last Updated: November 1, 2023

Under the California Consumer Privacy Act, as amended (“CCPA”), California residents have the right to receive certain disclosures regarding our processing and sharing of “personal data,” as defined under the CCPA.

In this section, we provide additional information to California residents about how we handle their personal information, as required under California privacy laws including the CCPA. This section does not address or apply to our handling of personal information that is exempt under the CCPA.

11:11 Systems is committed to maintaining and using deidentified information in compliance with the CCPA.

i. Categories of Personal Information Under the CCPA

While our processing of personal information varies based upon our relationship and interactions with you, in this section we describe, generally, how we process personal information (as defined by the CCPA) about California residents (and have processed in the prior 12 months from the Last Updated date above).

Categories of Personal Information Collected and Disclosed. The table below identifies, generally, the categories of personal information we have collected about California residents, as well as the categories of third parties to whom we may disclose this personal information for a business or commercial purpose.

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Categories of Personal Information	Description	Third party disclosures for business or commercial purposes
Identifiers	Includes direct identifiers, such as name, alias, user ID, username, account number or unique personal identifier; email address, phone number, address and other contact information; IP address and other online identifiers	<ul style="list-style-type: none"> • advisors and agents • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms • business customer/client
Customer Records	Includes personal information, such as name, account name, user ID, contact information, education and employment information, account number, and financial or payment information), that individuals provide us in order to purchase or obtain our products and services. For example, this may include information collected when an individual register for an account, purchases or orders our products and services, or enters into an agreement with us related to our products and services.	<ul style="list-style-type: none"> • advisors and agents • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms
Commercial information	Includes records of products or services purchased, obtained, or considered, or other purchasing or use histories or tendencies. For example, this may include demographic information that we receive from third parties in order to better understand and reach our customers.	<ul style="list-style-type: none"> • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms
Internet and electronic	Including, but not limited to, browsing history, clickstream data,	<ul style="list-style-type: none"> • regulators, government entities and law enforcement

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Categories of Personal Information	Description	Third party disclosures for business or commercial purposes
network activity information	search history, and information regarding interactions with an internet website or advertisement, including other usage data related to your use of any of our Services or other online services.	<ul style="list-style-type: none"> • affiliates and subsidiaries • internet service providers, operating systems and platforms
Location data	General location information about a particular individual including city, state, or region. Geolocation data, such as IP address, is collected but not shared with any third parties.	<ul style="list-style-type: none"> • advisors and agents • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms
Audio, visual and other electronic data	Includes audio, electronic, visual, or similar information such as CCTV footage (e.g., collected from visitors to our offices and premises, photographs and images (e.g., that you provide us or post to your profile) and call recordings (e.g., of customer support calls)].	<ul style="list-style-type: none"> • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms
Professional information	Includes professional and employment-related information [(such as current and former employer(s) and position(s), business contact information and professional memberships)].	<ul style="list-style-type: none"> • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems and platforms
Sensitive personal information	We may collect account log-in in combination with any required security or access code, password, or credentials allowing access to an account. We collect financial account, debit card, or credit card information through our customer console for the purposes of processing payment transactions.	<ul style="list-style-type: none"> • regulators, government entities and law enforcement • affiliates and subsidiaries • internet service providers, operating systems, and platforms, payment providers

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Sources of Personal Information. In general, we may collect the categories of personal information identified in the table above from the following categories of sources:

- Directly from individuals
- Our website and online services
- From third-party service providers, data brokers or business partners
- From third party sources
- Advertising networks
- Social networks
- Business customer/client

Purposes for collecting and disclosing. As described in more detail in Section 2, *What do we use this information for?*, in general, we collect and otherwise process the above personal information for the following business or commercial purposes:

- Services and support
- Analytics and improvement
- Customization and personalization
- Marketing and advertising
- Research and surveys
- Security and protection of rights
- Legal proceedings and obligations
- General business and operational activities and support

As described in more detail in Section 3, *Disclosures of Personal Information*, generally, we disclose the personal information we collect in order to provide our Services to you, respond to and fulfil your orders and requests, as otherwise directed or consented to by you, and for the purposes otherwise described in this Policy, including:

- Services and support
- Analytics and improvement
- Marketing, advertising and campaign management
- In support of business transfers and operations
- Compliance, governance and legal requirements
- Security and protection of rights

Retention. We retain the personal information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time

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of collection. For example, we will retain your account data for as long as you have an active account with us and transactional data for as long as necessary to comply with our tax, accounting and recordkeeping obligations, administer applicable returns and warranty programs, and for research, development and safety purposes, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and comply with legal obligations.

Sales and Sharing of Personal Information. The CCPA also requires that we disclose how we ‘sell’ and ‘share’ personal information. Under the CCPA, a ‘sale’ is defined broadly to include disclosing or making available personal information to a third-party in exchange for monetary compensation or other benefits or value, and ‘share’ broadly includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. We may disclose personal information (full name, title, employer name and professional contact information) to third parties (such as event co-sponsors) in exchange for benefits or value. Also via the cookies and trackers on our website, we may sell or share: Internet and electronic network activity information, location data, and identifiers (not including SSN or other government identifiers), and we may disclose or make available these categories of personal information to advertising networks and third party ad companies, in support of our marketing, advertising and campaign management purposes, including to analyze use of the Services, optimize and develop our Products and Services, improve and measure our ad campaigns, and reach users with more relevant ads and content within the Services and on third party sites and services.

We do not, however, knowingly sell or share any personal information about minors under 16 years old.

ii. California Residents’ Rights

CCPA Rights. In general, California residents have the following rights with respect to their personal information:

- *Do-not-sell or share (opt-out):* California residents may opt out of sales and sharing of their personal information by us, by submitting a request here or, for opt-outs of targeting cookies or other targeting trackers on our website, by using our preference manager.

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- *Right of deletion:* to request deletion of their personal information that we have collected about them and to have such personal information deleted (without charge), subject to certain exceptions.
- *Right to know:* with respect to the personal information we have collected about them, to require that we disclose the following to them (up to twice per year and subject to certain exemptions):
 - categories of personal information collected;
 - categories of sources of personal information;
 - categories of personal information about them we have disclosed for a business purpose, sold or shared;
 - categories of third parties to whom we have sold, shared or disclosed for a business purpose their personal information;
 - the business or commercial purposes for collecting, selling or sharing personal information; and
 - a copy of the specific pieces of personal information we have collected about them.
- *Right to correct:* the right to request that a business that maintains inaccurate personal information about the resident correct that personal information.
- *Right to non-discrimination:* the right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

Submitting CCPA Requests. California residents may exercise their California privacy rights as set forth below.

Request to know (access), correct, delete and limit. California residents may submit CCPA requests to access/know, correct and delete their personal information maintained by us through one of the following methods:

- Logging into their account and [Contact Support | 11:11 Systems | Cloud Connectivity & Security \(1111systems.com\)](#)
- By contacting either our Legal team at Legal@1111Systems.com or the Compliance team at Compliance@1111systems.com.

We will take steps to verify your request by matching the information provided by you with the information we have in our records. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor. We ask that authorized agents initiate a request on behalf of another individual by contacting Legal@1111Systems.com; authorized agents will be required

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to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.

Requests to Opt Out of Sales and Sharing. California residents may submit a request to opt out of sales and sharing by:

- To opt out of targeting cookies and other trackers, clicking the Do Not Sell or Share My Information link in the footer of our website or accessing our cookie preference manager and opting out of targeting cookies.
- Turning on “Global Privacy Control” signals through your browser, which our website shall process as a request to opt out of sales and sharing for the relevant browser and device.

For more information about our privacy practices, you may contact us as set forth in Contact Us section, above.

Additional Information for EEA or UK Residents or Individuals Doing Business with a 11:11 Systems Group entity Headquartered in the EEA or the UK

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i. Controller

To the extent you visit our website, the controller of your personal information collected on the website is 11:11 Systems (US company). If you are doing business with an 11:11 Systems group entity headquartered in the EEA or UK, that entity is the controller of your personal information. Please see the chart below for the specific entity and its contact information.

iLand Europe, Ltd. Lower Ground Floor 51 Eastcheap London EC3M 1JP	United Kingdom	Company Number: 06366153
iLand Nederland B.V. Zekeringstraat 21B 1014BM Amsterdam The Netherlands	Netherlands	Registration Number: 68473559

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ii. Data Subject Rights

Subject to conditions and limitations set forth in applicable data protection laws, such as the EEA GDPR and UK GDPR, you have the right to:

Request access to your personal information (commonly known as a “data subject access request”). This enables you to access and receive a copy of the personal information we hold about you. You also have the right to request confirmation and information about the personal information we hold about you.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you completed or corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no reason recognized by law for us to continue to process it. You also have the right to ask us to delete or remove your personal information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal information to comply with applicable law.

Object to processing of your personal information (including profiling) where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your interests, rights and freedoms.

You also have the right to object where we are processing your personal information for direct marketing purposes, including profiling related to direct marketing.

Request restriction of processing of your personal information. This enables you to ask us to suspend the processing of your personal information in the following scenarios:

- If you want us to establish the information's accuracy.
- Where our use of the information is unlawful but you do not want us to erase it.
- Where you need us to hold the information even if we no longer require it as you need it to establish, exercise or defend legal claims.

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- You have objected to our use of your information but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal information to you or to a third party (**portability right**). We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. Note that this right only applies to information processed by automated means, which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you believe that any personal information we have about you is incorrect, or is, has been, or might be used inappropriately or you would like to exercise one of the above mentioned rights please contact us at compliance@111systems.com and we will take steps to correct or delete the information, or restrict its use, as appropriate.

You also have the right to **lodge a complaint** with the relevant data protection supervisory authority.

iii. Purposes of Processing and Legal Bases

We will process your personal information on the basis of the following legal bases:

- **Performance of a Contract:** To perform a contract with you or take steps to enter into a contract with you at your request.
- **Legitimate Interest:** Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights and freedoms do not override those interests.
- **Compliance with Legal Obligations:** To comply with a legal obligation.
- **Consent:** Where you provide your consent.

In particular, we will use your personal information in the following circumstances:

Purpose	Legal Basis	Categories of Personal Information Processed
Process your service requests, process orders for Products or	Performance of a Contract.	Identity and Contact Data.

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Purpose	Legal Basis	Categories of Personal Information Processed
Services, handle orders, deliver Products and Services, facilitate the processing of payments by third party service providers, communicate about orders.		
Correspond about services you may be interested in purchasing and establish your account.	Performance of a Contract.	Identity and Contact Data.
Provide after-sales support and customer service.	Performance of a Contract.	Identity and Contact Data.
Administer surveys and questionnaires for market research or member satisfaction purposes.	Legitimate Interest in understanding our customers' needs in order to improve our Products and Services to grow our sales.	Identity and Contact Data.
Recommend Products and Services that might be of interest to you, personalize your visit to our website, enable us to review develop and continually improve the Products and Services we provide online.	Legitimate Interest in understanding our customers' needs in order to improve our Products and Services and to encourage interaction with us, to grow our sales.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Enforce our legal rights; protect the rights and safety of others; assist with industry efforts to control fraud, spam or other undesirable conduct; prevent or detect fraud (including credit risk reduction) or abuses of our website; respond to legal process and manage legal proceedings; respond to lawful requests from public authorities in regard to law enforcement or national security requirements.	Compliance with EEA or UK law where we are required to respond to legal process or lawful requests. Otherwise, Legitimate Interest in protecting our rights, assets, and reputation, and complying with applicable law in order to protect our business and reputation.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Diagnose problems with our servers, and administer our website.	Legitimate Interest in securing and protecting our website in order to encourage potential customers, customers and other third parties to interact with us.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Administer our general business, accounting, auditing, compliance, recordkeeping, and legal functions;	Compliance with EEA or UK law.	Identity and Contact Data.

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Purpose	Legal Basis	Categories of Personal Information Processed
comply with the law and our legal obligations.	Otherwise, Legitimate Interest in operating our business in an efficient manner to increase profitability, and in compliance with the law to protect our reputation.	
Consider and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions.	Legitimate Interest in organizing and operating our business in an efficient manner to increase profitability. Compliance with EEA or UK law.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Send information about our company to visitors and potential customers, and to get in touch with them when necessary, and respond to visitors' inquiries on our website.	Consent, where required by law. Legitimate Interest in promoting our Products and Services and encouraging interaction with us in order to grow our sales.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Allow us to tailor content or advertisements to match your preferred interest; avoid showing visitors the same advertisements repeatedly; compile aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website; count the number of users of our sites.	Consent.	Technical and Device Data; Website Interaction Data.
Count the number of times that our advertisements and web-based email content are viewed.	Consent.	Identity and Contact Data; Technical and Device Data; Website Interaction Data.
Measure interest in and develop our web pages and marketing plans, customize the content you view on your web visits based on your activity on past visits.	Consent.	Technical and Device Data; Website Interaction Data.

iv. Retention

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We retain the personal information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. For example, we will retain your account data for as long as you have an active account with us and transactional data for as long as necessary to comply with our tax, accounting and recordkeeping obligations, administer applicable returns and warranty programs, and for research, development and safety purposes, as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and comply with legal obligations.

v. Personal information received from the EEA and UK, and Cross-border data transfers

To facilitate 11:11 Systems’ business practices, your personal information may be transferred to or processed in the following locations outside of the EEA or UK: the United States (which has not been deemed to provide adequate protection to personal information, except in circumstances not relevant to 11:11 Systems. The following chart details the other countries where your personal information may be transferred and the adequacy decision for each country.

Country	EEA/UK Adequacy Determination (yes/no)
United States	Yes, for commercial organizations participating in the EU-US Data Privacy Framework and (as applicable) the UK Extension. 11:11 does not participate in the Framework or the Extension.
Canada	Yes
India	No
Australia	No
Singapore	No

When transferring personal information to countries that have not been deemed adequate, 11:11 Systems has implemented safeguards internally and with third parties to ensure an adequate level of data protection for cross-border data transfers, such as the reliance on the Standard Contractual Clauses adopted by the European Commission and the UK equivalent, or any alternative transfer mechanism that

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complies with applicable law. We will provide you a copy of the relevant safeguards upon request sent to Legal@1111Systems.com

vi. Contact Us

- **EEA Representative**

11:11 Systems has appointed IT Governance Europe Limited as the EEA representative. If you wish to exercise your rights under the EEA General Data Protection Regulation (GDPR), please email our representative at eurep@itgovernance.eu. Please ensure that you include our company name in any correspondence you send to our EEA representative.

- **Data Protection Officer**

To manage 11:11 Systems' relationship with EEA and UK Data Protection Authorities, 11:11 Systems has a Data Protection Officer (DPO). For any questions related to your rights or general privacy matters, please email grcilaw@grcilaw.com or send your query to:

ATTN: GDPR DPO inquiry
GRCI Law Limited
Unit 3, Clive Court, Bartholomew's Walk,
Cambridgeshire Business Park, Ely CB7 4EA
United Kingdom