

Data Privacy Framework Notice (DPF Notice)

11:11 Systems Inc. (**11:11**) complies with the EU-U.S. Data Privacy Framework (**EU-U.S. DPF**), the UK Extension to the EU-U.S. DPF (**UK Extension**), and the Swiss-U.S. Data Privacy Framework (**Swiss-U.S. DPF**) (together, the **Data Privacy Framework** or **DPF**) as set forth by the U.S. Department of Commerce.

11:11 has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (**EU-U.S. DPF Principles**) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension. 11:11 also has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (**Swiss-U.S. DPF Principles**) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. In this DPF Notice, we refer to the EU-U.S. DPF Principles and the Swiss-U.S. DPF Principles as the **DPF Principles**.

The nature and scope of the personal data 11:11 receives in reliance on the DPF Principles are described below.

If there is any conflict between the terms in this DPF Notice and the DPF Principles, the DPF Principles will govern.

Visit <https://www.dataprivacyframework.gov/> to learn more about the Data Privacy Framework program and to see our certification.

Defined Terms used in this DPF Notice

The term “**controller**” means an entity that decides how and why to collect, use and process personal data. Our customers are controllers, or act on behalf of their customers as controllers, of the personal data described in this DPF Notice.

The term “**data subject**” means an individual whose personal data is transferred to us by one of our customers in the EU, Switzerland or the UK.

The term “**personal data**” means any information relating to an identified, or identifiable, data subject.

The term “**processor**” means an entity that processes personal data on behalf of a controller. 11:11 acts as a processor on behalf of its customers when processing personal data that is described in this DPF Notice.

Scope of this DPF Notice and Purposes of Personal Data Processing

We provide our products and services to businesses. These products and services are notably our cloud, backup, disaster recovery, security and cloud connectivity services (together, the “**Services**”). When our customers purchase one of these Services, they provide us with data, which may include

personal data, and ask us to process that data as a processor on behalf of our customer, at the customer's direction.

Our customers are solely responsible for determining the personal data that they provide to us so that we may process it as a processor on behalf of our customers ("**Customer Content**"). Our processing of Customer Content is subject to the terms of our contracts with each customer, who is the controller, or acting on behalf of the controller, for the Customer Content that we process on their behalf.

Customer Content may include personal data in the form of name, email, contact information (including telephone numbers and email addresses), and other relevant customer contact information, as well as hostnames, IP addresses and usernames of customers' users, which we will store, transmit, and receive in an encrypted format: in order to provide our services to our customers; for customer service; to provide consultancy services; for research and analytics purposes; or to carry out technical, logistical, or other functions on behalf of our customers; in each case, in line with customer contractual obligations, and as directed by our customers. Customer Content also includes service reports, which we generate in order to provide evidence of customer contract compliance.

Where we are acting as a processor to our customers, our customer's privacy notice or policy will dictate the scope and manner of processing, together with any applicable contract terms.

Customer Content will be transferred to 11:11 in reliance on the DPF Principles.

11:11's Adherence to the DPF Principles

11:11 has certified that it adheres to the DPF Principles: Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability, with respect to Customer Content received from the EU, Switzerland or the UK in reliance on the DPF.

NOTICE

11:11 acts as a processor of the Customer Content that is transferred to us in the U.S. by, or on behalf of, our customers in the EU, Switzerland or the UK. Our customers are responsible for providing appropriate notice to data subjects, and ensuring that the collection of Customer Content is made in reliance on an appropriate legal basis.

Listed above in this Notice, we provide information about the Customer Content our customers transfer to us in reliance on the DPF Principles, and our purposes of processing that Content on behalf of our customers.

In addition, our 11:11 Privacy Notice available at [Privacy & Confidentiality of Personal Data Notice | 11:11](#) provides information about our processing, notably when we act as a controller of personal data. The 11:11 Privacy Notice includes details about the types of personal data we collect, the purposes of processing, sharing of personal data with third parties, the rights data subjects have for limiting the use and disclosure of their personal data, and how to contact us about our personal

CHOICE

ACCOUNTABILITY FOR ONWARD TRANSFER

Accordingly, 11:11 Systems cannot be held responsible for unauthorized or unintended access that is beyond our control.

Our policies and controls permit only authorized employees, who are trained in the proper handling of personal data, to have access to that data. 11:11 conducts periodic reviews of employee compliance with these policies. Employees who violate our security and privacy policies may be subject to disciplinary procedures.

DATA INTEGRITY AND PURPOSE LIMITATION

11:11 retains Customer Content covered by this DPF Notice as instructed by its customers, acting as controllers or as processors to their customers. Personal data may also be retained for a period of time necessary to comply with state, local, federal regulations, or country-specific regulations and requirements, and in accordance with 11:11's applicable data retention policies.

11:11 will not use the Customer Content covered by this DPF Notice in a manner that is incompatible with the purpose for which it was originally collected, except as permitted by applicable law.

ACCESS

When 11:11 receives the Customer Content covered by this DPF Notice, 11:11 acts as a processor for its customers and our customers are responsible for providing data subjects with access to the Customer Content, and the right to correct, amend or delete that Content where it is inaccurate or where it has been processed in violation of the DPF Principles, as appropriate. Data subjects should direct their questions to the appropriate 11:11 customer. If a data subject is unable to contact the appropriate customer, or does not obtain a response from the customer, 11:11 will provide reasonable assistance in forwarding the data subject's request to the customer.

RECOURSE, ENFORCEMENT AND LIABILITY

11:11 is subject to the investigatory and enforcement powers of the US Federal Trade Commission (FTC), which has jurisdiction over 11:11's compliance with this DPF Notice and the DPF Principles. In compliance with the DPF Principles, 11:11 commits to resolve DPF Principles-related complaints about our collection or use of personal data included in the Customer Content transferred from our customers in the EU, Switzerland or the UK.

Data subjects who have inquiries or complaints regarding our handling of the Customer Content received in reliance on the DPF should first contact 11:11 at privacy@1111systems.com.

In compliance with the DPF Principles, 11:11 commits to refer unresolved complaints concerning our handling of Customer Content received in reliance on the DPF to JAMS, an independent, alternative dispute resolution provider based in the U.S. Information about JAMS dispute resolution is available at the following address: <https://www.jamsadr.com/DPF-Dispute-Resolution>. 11:11 will cooperate with JAMS to resolve DPF-related complaints. Accordingly, if you have contacted us at privacy@1111systems.com but do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit: <https://www.jamsadr.com/file-a-dpf-claim> to file a complaint. The services of JAMS are provided at no cost to you.

11:11 SYSTEMS

If your DPF complaint cannot be resolved through the above channels, you may be entitled, under certain conditions, to invoke binding arbitration for certain residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction> for further information.

11:11 agrees to periodically review and verify its compliance with the DPF Principles, and to remedy any issues arising out of failure to comply with the DPF Principles. 11:11 understands that if it fails to provide an annual self-certification to the U.S. Department of Commerce, 11:11 will be removed from the Department's list of DPF participants.

Contact Information

If you have any questions in relation to this DPF Notice or you wish to exercise any of your rights, please contact us at:

privacy@1111systems.com

You may also contact us at:

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

Changes to this DPF Notice

Any changes or updates we may make to this DPF Notice will be posted on this page in advance. Please check back frequently to see any updates or changes made to this DPF Notice.

Effective March 2025