Intel 471, Inc. / EU-US and Swiss-US Privacy Shield Policy

Intel 471, Inc. and all of its EU-based subsidiaries (herein collectively referred to as “Intel 471,” “Company,” “we,” “us,” or “our”) are committed to protecting your privacy. We publish our Privacy Policy so that you can understand our privacy practices and how they help protect your privacy.

Intel 471 is a trans-national business headquartered in the United States. Our management structure and business processes cross borders. This means that our customer and employee data is transferred across borders.

Intel 471 may from time to time handle personal information collected from individuals located within European Union member countries. Intel 471 has certified that it adheres to the EU-US and Swiss-US Privacy Shield Principles of:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purposes limitation
- Access
- Recourse, enforcement and liability

Intel 471 complies with the EU-U.S. Privacy Shield Framework and Swiss-US Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Intel 471 has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit [https://www.privacyshield.gov/](https://www.privacyshield.gov/)

Intel 471 is under the jurisdiction as well as the investigatory and enforcement powers of the US Federal Trade Commission for the purposes of the EU-US Privacy Shield Framework and Swiss-US Privacy Shield Framework.

Scope

This Policy applies to all information collected by Intel 471 from which an individual can be identified (“Personal Information”). The Personal Information we collect includes the Employee Information described below as well as certain information including names, email addresses, mailing and billing addresses and telephone and fax numbers collected from customers, potential customers and end users of our products and services for sales, marketing, order fulfilment and order delivery purposes. Additionally, in our section on Online Information we also discuss how we gather and use all information gathered online even if it is not Personal Information. Intel 471 will not deviate from this Policy even if applicable national laws are less stringent than this Policy.
Notice

Excluding our Employee Information which is discussed below, we collect, process and use your Personal Information only as a part of our business relationship with you and your company, including contract and billing administration; product and service delivery; fulfilling our business obligations to our customers and resellers; communicating with customers and potential customers about marketing and technical information concerning our products and services; notifying our customers and potential customers regarding product launches and important events related to Intel 471; and other related business activities of which you are informed at the time your Personal Information is collected or as soon thereafter as practicable. Intel 471 only collects personally identifiable information about individuals when such individuals specifically provide such information to us on a voluntary basis or while requesting information on our products or services. We may disclose Personal Information to our agents, resellers and business partners or to protect and defend the rights or property of Intel 471. Intel 471 must reply to lawful requests from public authorities, including to meet national security or law enforcement requirements, for disclosure of Personal Information.

Intel 471 does not sell, lease, or rent Personal Information to third parties.

Online Information

In general, you may visit our Websites without providing any Personal Information. However, you may choose to provide us with Personal Information by completing online forms. At the point of collection we will inform you of how your Personal Information will be used; apart from these uses, Intel 471 will only use your Personal Information in accordance with the terms of this Policy.

Use of Cookies

Cookies are small files that a site transfers to your computer’s hard drive through your web browser (if you allow) that enables it to recognize your browser and capture and remember certain information. A cookie cannot read data off your hard drive or read cookie files created by other sites. Cookies may do things like allow you to navigate faster through the site, remember your preferences and passwords and generally improve the user experience. You can turn off the ability to receive cookies by adjusting your browser settings – please note that if you do so, this may affect the functionality of the website and the information you can access through it.

Intel 471 uses cookies to compile aggregate data about website traffic and interaction so that we can offer better site experience and content in the future. We use third-party companies to assist us in understanding our website visitors.

Employee Information

We collect Employee Information from prospective and present Employees only for legitimate business purposes, including

(1) the management and operations of our company, its functions and activities,
(2) Employee communications, including Employee surveys,
(3) maintaining a global directory,
(4) carrying out obligations under employment contracts and employment, tax and benefits laws, and in connection with other working relationships or arrangements,
(5) development and training programs,
(6) recruiting and hiring job applicants,
(7) assessing qualifications and performance,
(8) performing background checks and verifying references where applicable,
(9) managing Employee performance,
(10) determining Employee compensation or payment,
managing the Employee termination process, and
other general human resources purposes.

Our European Union Employees at the time of their employment are notified in detail how their Personal Information will be used. Employee information on health, performance evaluations and disciplinary actions and other sensitive Employee matters, whether it is stored manually or electronically, is accessible by other Intel 471 Employees only if necessary with respect to legitimate human resource functions or issues. Intel 471 will obtain affirmative consent from an Employee before using such Employee’s Personal Information for any purpose other than described above. Employees may decline to provide this consent, and Employees may withdraw their consent at any time.

For legitimate human resources purposes, Employees may choose to voluntarily disclose Personal Information about family members. If our Employees choose to do this, their family member’s Personal Information shall be treated, for the purposes of this Policy, the same as an Employee’s Personal Information. Employee Personal Information is never sold, leased or rented to any third party. Employee Personal Information will never be disclosed to third parties except as follows:

1. to those retained by Intel 471 as agents for the purposes set forth in the paragraph above,
2. where required pursuant to an applicable law, government or judicial order, law or regulation, or to protect the rights or property of Intel 471
3. where authorised in writing by the Employee, and
4. where the Employee voluntarily provides Personal Information and the context makes it clear such information will be provided to a third party.

Where personal data is transferred from the EU to the US in the context of the employment relationship, we will cooperate in investigations by and to comply with the advice of the competent EU Authorities.

Choice
We will always give you an opportunity to choose opt-out before your Personal Information is (1) disclosed to a third party (other than an Intel 471 agent doing work at our direction), or (2) to be used for a purpose that is materially different than that for which it was originally collected or subsequently authorised by you. Although we do not ever anticipate providing sensitive Personal Information, such as Employee health information, to a non-agent third party or using it for a purpose other than that for which it was collected, we will never do so without first allowing the individual involved to affirmatively and expressly consent (opt-in) to such transfer or use. The only exception to this choice for both sensitive and non-sensitive Personal Information would be where we are required to disclose your Personal Information pursuant to government or judicial order, law or regulation to meet national security or law enforcement requirements.

At a minimum, you will always be able to opt-out from receiving marketing materials from Intel 471. If we determine that applicable national law requires that more stringent requirements (opt-in) be applied before you receive marketing material or other communications from us, we will implement the same.

Accountability for Onward Transfer
We will not transfer Personal Information originating in the EU or Switzerland to third parties unless such third parties have entered into an agreement in writing with us requiring them to provide at least the same level of privacy protection to your Personal Information as required by the Principles of the EU-US and Swiss-US Privacy Shield Frameworks. We will only transfer data to our agents, resellers or third party service providers (such as accountants, attorneys, consultants and other
service providers) who need the information in order to provide services or to perform activities on behalf of Intel 471, including in connection with the delivery of services or products, Intel 471’s management, or legal responsibilities. We acknowledge our liability for such data transfers to third parties.

To protect Personal Information collected and stored by Intel 471, we have in place reasonable and appropriate technical and operational security measures to prevent Personal Information from loss, misuse, unauthorised access, disclosure, alteration and destruction.

Data Integrity and Purpose Limitation
We will only collect and retain Personal Information which is relevant to the purposes for which the information is collected, and we will not use it in a way that is incompatible with such purposes unless such use has been subsequently authorised by you. We will take reasonable steps to ensure that Personal Information is reliable for its intended use, accurate, complete and current. We may occasionally contact you to determine that your data is still accurate and current.

Access
You have the right to access personal data relating to you. If you wish to access, amend, or confirm that Intel 471 has personal data relating to you, or if you wish to correct or delete your Personal Information if it is inaccurate, please notify us at dataprotection@intel471.com or at (800) 833-1471. We will respond to your request within a reasonable time.

Employees may review their personal files and any Personal Information concerning them upon by emailing dataprotection@intel471.com.

Recourse, Enforcement and Liability
Since we are committed to protecting your privacy as set forth in this Policy, if you think we are not in compliance with our Policy, or if you have any question or if you wish to take any other action concerning this Policy or your Personal Information, we encourage you to contact us at dataprotection@intel471.com or call us at (800) 833-1471. We will investigate your complaint, take appropriate action and report back to you within 45 days.

If the Personal Information in question was transferred from the EU or Switzerland to the United States, and you are not satisfied with our response, Intel 471 has agreed to participate in the dispute resolution procedures of the panel established by the EU data protection authorities (DPAs) and Swiss FDPIC to resolve disputes pursuant to the EU-US Privacy Shield Principles. A resident of the European Union (EU) or Switzerland whose enquiry has not been satisfactorily addressed may contact the EU DPAs panel or individual EU DPAs using the information provided at http://ec.europa.eu/justice/data-protection/bodies/authorities/third-countries/index_en.htm to resolve disputes pursuant to the EU-US and Swiss-US Privacy Shield Principles.

Intel 471 commits to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources and non-human resources data transferred from the EU and Switzerland in the context of the employment relationship.

Finally, as a last resort and in limited situations, EU and Swiss individuals may seek redress from the Privacy Shield Panel, a binding arbitration mechanism.

The services of the EU DPAs panel are provided at no cost to you.
Limitation on Application of Principles
Adherence by Intel 471 to these EU-US and Swiss-US Privacy Shield Principles may be limited (a) to
the extent required to respond to a legal or ethical obligation; (b) to the extent necessary to meet
national security, public interest or law enforcement obligations; (c) to the extent expressly
permitted by an applicable law, rule or regulation; and (d) to the extent that Intel 471 has limited or
no control over the actions of the individuals who have provided information.

Contact Information
Questions or comments regarding this Policy should be submitted to Intel 471 by email to:
dataprotection@intel471.com or by mail to: Intel 471 65321 Preston Rd., Suite 285, Frisco, TX
75034.

Changes to this EU-US and Swiss-US Privacy Shield Privacy Policy
This Policy may be amended from time to time, consistent with the requirements of the EU-US and
Swiss-US Privacy Shield Principles. A notice will be posted on the Intel 471 website (https://Intel
471.com/) for 60 days whenever this EU-US and Swiss-US Privacy Shield Privacy Policy is changed in a
material way.

Effective Date:
06/24/2020