

# TWO-I PRIVACY POLICY

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Data Protection and GDPR

26 June 2019

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## Overview

Two-I SAS operates internationally through the network of partners and resellers. On regular basis company is represented in France.

Two-i SAS (“Two-i”, “we”, “us”, “our”) know how important privacy is to our customers, and we strive to be clear about how we collect, use, disclose, transfer, and store your personal information.

We have designed our web sites, mobile, desktop applications in a way that will enable you to visit and access most of the available information and material without having to submit any personal data unless you choose to. However, in order to take part in some of the functions and activities and to get access to some of Two-i SAS, it will be necessary for you to provide personal data on certain areas of the web sites.

## Purpose

Personally identifiable information (“Personal Data”) is data that can be used to uniquely identify or contact a single person. Personal Data that you choose to submit to us, or which is collected by us is used solely for the purpose of improving the relations between you and Two-i. Two-i and its subsidiaries may share this Personal Data with each other and use it consistent with this Privacy Policy.

## What Personal Data Do We Collect?

The Website collects non-personally identifiable information from your computer when you browse the Website and request pages from our servers. This means that, unless you voluntarily and knowingly provide us with your personally identifiable information, Two-i will not know your name, your e-mail address, or any other personally identifiable information. When you request a page from our Website, our servers log the information provided in the HTTP request header, JavaScript or similar technical tools, including the IP number, the time of the request, the URL of your request and other information. We collect this information in order to make the Website function correctly and provide you the functionality that you see on the Website. We also use this information to better understand how visitors use the Website and how we can better adjust the Website, its contents, and functionality to meet the needs of our users. We do not match such information with any of your personally identifiable information.

## Links to Third Party Websites

The Site contains links to other websites. Your use of websites to which the Site link is subject to the terms of use and privacy policies located on such third-party websites, note that this online privacy policy does not automatically apply to these third-party sites.

## Cookies

We do not use cookies for tracking purposes.

## Market contact

On occasion we may contact you to provide you with marketing information that we believe is of interest to you, or we may ask for your opinions in a market survey. We may also notify you of your ability to subscribe to a number of e-newsletters that provide, for example, up-to-date information on our current products or solutions. You will always have the option of telling us whether or not you want to receive such market information or be involved in our research activities.

## How do we protect visitor information?

All data is encrypted via SSL/TLS when transmitted from our servers to and from your browser. Our website and infrastructure is scanned on a regular basis for security holes and known vulnerabilities in order to make your visit to our site as safe as possible.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. Two-i is very cautious with safeguarding your information. We employ administrative, physical and electronic measures designed to protect your information from unauthorized access.

## Transfer of Personal Data

Two-i shall not sell, trade or lease to third parties your Personal Data. Unless we have informed you otherwise and have obtained your permission, or the law forces us to, we will only use the collected Personal Data within Two-i or with business partners that act on our behalf.

As stated previously, you have the option of letting us know if you do not wish to receive unsolicited direct marketing materials, and we will strive to honour your request.

## Data retention

We will not keep your personal data for longer than is necessary for the purpose it was collected. This means that data will be destroyed or erased from our systems when it is no longer required.

We take appropriate steps to ensure that we process and retain information about you based on the following logic:

1. at least the duration for which the information is used to provide you with a service;
2. as required under law, a contract, or with regard to our statutory obligations; or
3. only for as long as is necessary for the purpose for which it was collected, is processed, or longer if required under any contract, by applicable law, or for statistical purposes, subject to appropriate safeguards.

## Your rights

You have the right to request details about the information we collect about you and to request us to correct inaccuracies in that information, to object to or request the restriction of processing, and to request access to, or the erasure or portability of your information. Under the laws of some jurisdictions, we may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

## Can Children Use Our Services?

The Site and Services are intended for users who are 18 years old or older. We do not knowingly collect Personal Information from children under the age of 18. If we become aware that we have inadvertently received Personal Information from a child under the age of 18, we will delete such information from our records.

## CAN SPAM Act

The CAN-SPAM Act is a law that sets the rules for commercial email, establishes requirements for commercial messages, gives recipients the right to have emails stopped from being sent to them, and spells out tough penalties for violations.

To be in accordance with CANSPAM we agree to the following:

1. NOT use false, or misleading subjects or email addresses
2. Identify the message as an advertisement in some reasonable way
3. Include the physical address of our business or site headquarters
4. Monitor third party email marketing services for compliance, if one is used.
5. Honour opt-out/unsubscribe requests quickly
6. Allow users to unsubscribe by using the link at the bottom of each email

## Policy Changes

Two-I reserves the right to change this Privacy Policy and will post any revisions on the Site. We encourage you to review this Privacy Policy regularly for any changes. Your continued use

of the Site will be subject to the then-current Privacy Policy. This Privacy Policy was last revised June 17, 2019.

## Contact Us

You may contact us if you have general questions or concerns about this Privacy Policy and supplemental notices or the way in which we handle your Personal Data. We welcome the changes that have come as part of the General Data Protection Regulation (GDPR). As a part of our GDPR preparation, we have created the GDPR Support E-mail: [privacy@two-i.com](mailto:privacy@two-i.com)