

AVPRO GLOBAL HOLDINGS, LLC PRIVACY POLICY

General Terms

AVPRO Global Holdings, LLC and all of its subsidiaries (collectively known as “AVPRO” for purposes of this privacy policy) values our customers, as well as your interest in our products and services.

AVPRO respects privacy. AVPRO recognizes the importance of maintaining the privacy of personal data. AVPRO processes any personal data collected in accordance with the legal provisions for the countries in which the personal data is received, kept, and maintained.

This Privacy Policy applies to our use of any personal data provided to or collected by AVPRO and explains how AVPRO uses your personal data.

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1. What Type of Personal Information Do We Collect?

AVPRO collects different types of personal data. Both outside and within the United States, AVPRO collects personal data belonging to its contractors, suppliers, and customers that is relevant for the business purposes described below. This privacy policy also applies to all information collected by or submitted to AVPRO or its services via AVPRO’s products, services, and website(s), including any information by which you may be personally identified, such as name, postal address, email address, telephone number(s), or any other information defined as personal or personally identifiable data under applicable law.

Much of the personal data AVPRO collects is voluntarily provided.

The types of personal data AVPRO collects include, but are not limited to:

- A. **Personal Data That You Provide:** We collect Personal Data from you when you voluntarily provide such information, such as when you contact us with inquiries, create a AVPRO Network account (e.g. name, Email address, and password), respond to one of our surveys (e.g. name, Email address), purchase a Product (e.g. name, Email address, and shipping address), register your Product (name, Email address, and shipping address), communicate with customer service (e.g. name, Email address, phone number), provide information at a conference or event (e.g., name, and business or personal contact information), or otherwise use certain Products. In order to have access to certain Products and/or to purchase certain items, you may be required to provide credit card data or other acceptable payment information to our payment service provider.
- B. **Information Collected by Others:** We may receive additional information such as demographic and statistical information from third parties, such as business partners, marketers, researchers, analysts, and other parties. We use this information to supplement the information that we collect directly from you.
- C. **Automatically Collected Data:** When you interact with AVPRO through the Site or any Product, we receive and store certain information, which is collected passively using various technologies, as described below:
 - i. **Log Data:** When you visit our Site or use the Products, our servers record information (“log data”), including information that your browser automatically sends whenever you visit the Site. This log data may include web pages visited, browser type and settings, device type, length of visit, the date and time of your request, and product features you use. The Site also automatically captures your Internet Protocol (“IP”) address (from which we determine the country you are connecting from at the time you visit the Site). AVPRO uses IP addresses to analyze trends, administer the Site, track user movement, ensure the security of your interaction with the Site and gather broad demographic information for aggregate use.

In order to optimize our services to you and continually improve our products and services, we may ask you for information about your personal or professional interest, demographic background, your experiences with our products and services, as well as more detailed information pertaining to our contact with you. We may also use your IP address for some of our website services. Information on the “cookies” that we use and their features can be found in our Cookies section below.

Personal data does not include information that is not identified or identifiable to a natural person, or information that has been stripped of all identifiers such that an individual cannot be identified or re-identified.

2. How do we collect your data?

You directly provide AVPRO with most of the collected data. We collect data and process data when you:

- A. Register online or place an order for any of our products or services.
- B. Voluntarily complete a customer survey or provide feedback on any of our message boards or via email.
- C. Use or view our website via your browser's cookies.

3. How will your data be used?

AVPRO recognizes a person's right to access his/her own personal data, the right to obtain the updating rectification or integration of data, and the right to cancel the data in cases provided for by applicable laws. AVPRO will use your personal data only to the extent it is compatible with the following purposes:

- A. For legitimate business purposes and objectives (including, but not limited to, providing services, financing, customer support, product safety, marketing, promotions, and recruitment of employees) in compliance with the principles of relevance, pertinence, and utilizing processing methods adequate to such objectives (e.g. to provide you with password reminders or to notify you that a particular service has been suspended for maintenance);
- B. For compliance with processes and procedures provided for by AVPRO's system for protection of company data, according to which all data is classified in order to determine and perform necessary security measures;
- C. For service administration purposes, which means that AVPRO may contact you for reasons related to the service you have signed up for.

More particularly:

A. Customer Information & Service:

- i. To provide, personalize, improve, update and expand our services, which may include:
 - a. Authenticating your access to the services and improving AVPRO technological security;
 - b. To fulfill orders for products or services, and for other services related to your order such as product delivery, maintenance, warranty service, financing, leasing, and credit services;

- c. Processing your payments for products and/or service subscriptions or features;
- d. Provide support to products, product improvement, diagnostics and repairs, product safety or recalls;
- e. Building new and improving existing products and services; Conducting scientific or statistical research; or
- f. Enforcing our Terms and Conditions.

B. Communications:

- i. We use your personal data to communicate with you about the services such as when we:
 - a. Respond to your inquiries concerning services;
 - b. Inform you of product changes or updates, or new products and services;
 - c. Provide you with information or request action in response to technical, security, and other operational issues; or
 - d. To provide you with marketing, communications, and offers for products and services from AVPRO or our distributors or suppliers.

C. Marketing:

- i. We use your personal data to better manage our everyday business needs such as payment processing and financial account management, product development, product safety, contract management, website administration, web-forum management, order or contract fulfillment, analytics, fraud prevention, corporate governance, reporting and legal compliance.
- ii. AVPRO may use your personal data to send you information about our products and services that we think you might like.
- iii. You may always opt-out of receiving these marketing materials at any time. If you no longer wish to be contacted for marketing purposes, please contact us via the information in the Contact Us section below.

4. How do we store your data & how long do we keep it?

AVPRO stores your personal data on secure on-site servers or secure cloud servers. These servers are further secured by administrative restricted, password protected precautions.

AVPRO acquires and retains only the personal data that is required for effective operation of AVPRO or otherwise required by law. Access to such information is restricted internally to those with a recognized need to know.

5. Sharing Personal Data

AVPRO may share your personal data if we believe it is reasonably necessary to:

- A. Comply with valid legal process (e.g., subpoenas, warrants); Enforce or apply AVPRO's Terms and Conditions;
- B. Protect the security or integrity of services; or
- C. Protect the rights, property, or safety, of AVPRO, our employees or users.

AVPRO also uses various service providers to help us provide services to you. As a result, these partner companies will have some of your information in their systems. Our partner companies are subject to contractual obligations governing data security and confidentiality consistent with this Privacy Statement and applicable laws.

These processing partners include remote access service or third-party providers.

AVPRO does not sell or share any personal data with non-agent third parties.

6. Transfers of Your Personal Data to Other Countries

AVPRO is a global organization headquartered in Sioux Falls, South Dakota, United States of America and has legal entities, business functions, and systems in countries around the world. Although the personal data AVPRO processes, and all associated services and systems, is housed on a server located in the country where each AVPRO location operates, AVPRO and our service providers may transfer your personal data to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it.

Further information regarding the international transfer of personal data may be obtained by contacting us.

7. Recipients of the Personal Data

The personal data will be stored in a variety of locations or departments. The recipient(s) of the personal data will vary.

For customers, the recipient is the correlating division or subsidiary providing the service or product.

8. Cookies & Similar Technologies

Cookies are small text files placed on your device to store data that can be recalled by a web server in the domain that placed the cookie. Our website uses cookies to distinguish you from other users of our website and to collect information about your online preferences. This helps us to provide you with an optimal experience when you browse our website and also allows us to improve our site. We use cookies and similar technologies for storing and honoring your preferences and settings, enabling you to sign-in, combating fraud, analyzing how our products perform, and fulfilling other legitimate purposes. By continuing to browse the site, you are agreeing to our use of cookies.

We also use “web beacons” to help deliver cookies and gather usage and performance data. Our websites may include web beacons, cookies, or similar technologies from third- party service providers.

You have a variety of tools to control the data collected by cookies, web beacons, and similar technologies. For example, you can use controls in your Internet browser to limit how the websites you visit are able to use cookies and to withdraw your consent by clearing or blocking cookies.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. Most internet browsers are automatically set up to accept cookies. However, you can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Please note: if you use your browser settings to block some or all cookies you may not be able to access all or parts of our site.

9. Information Retention Policy

For AVPRO customers, we retain your information for as long as you maintain an account or as otherwise necessary to provide you with AVPRO services. AVPRO will also retain your personal data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. AVPRO will hold your personal data on our systems for as long as is necessary for the relevant product, or service, or as long as is set out in any relevant contract you have with AVPRO or AVPRO’s data retention schedule.

AVPRO will maintain personal data for as long as necessary to fulfill the purposes outlined in this document and per record retention requirements at the federal, state, and member state level based on the category of personal data processed.

AVPRO takes reasonable steps to ensure that personal data is accurate, complete, current, and reliable for its intended use.

Where permissible, we will also delete your personal data upon request; please see the Contact Us information below to make such a request.

Please note, however, that each request for deletion is subject to review by the AVPRO Policy Department; there may be certain circumstances in which we will have to keep and maintain the personal data even in light of your request. Those circumstances will be in accordance with the lawful basis for personal data retention under Article 6 of the General Data Protection Regulation (“GDPR”) – Lawfulness of processing.

AVPRO will keep your personal data for only the period of time that is required for effective operation of AVPRO or otherwise required by law. Once this time period has expired, we will delete your personal data.

10. Legal Basis for Processing Personal Data

Our legal basis for collecting and using the personal data described in this Privacy Policy will depend on the personal data concerned and the specific context in which we collect it. We collect and use your information for a variety of business purposes that are in our legitimate interest, in order to enter into or perform a contract with you, with your consent, or to comply with our legal obligations.

If you wish to learn more about specific legal grounds we rely on to process your information for any particular purpose (including any legitimate interest we have to process this information), please contact us as provided under the Contact Us section. In general, there are several legal bases for processing personal data which include: consent, performance of a contract, legitimate interest, vital interest, legal obligation, or public task.

11. Your Information Protection Rights (European Economic Area, “EEA”)

In the EEA, you have certain rights in relation to your personal data, including the right to access, correct, update, or request deletion of your personal data. AVPRO takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. Contact us via the information below about accessing, correcting, updating, or deleting your personal data, or altering your data. We will consider your request in accordance with applicable laws.

You can object to processing of your personal data, ask us to restrict processing of your personal data, or request portability of your personal data. Again, you can exercise these rights by contacting us as provided in the Contact Us section.

Similarly, if we have collected and processed your personal data with your consent, you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

A. What are your data protection rights in the EEA?

AVPRO would like to make sure you are aware of your data protection rights. Every user in the EEA is entitled to the following under the General Data Protection Regulation:

- i. **The right to access** – You have the right to request AVPRO for copies of your personal data. We may charge you a small fee for this service.
- ii. **The right to rectification** – You have the right to request that AVPRO corrects any information you believe to be inaccurate. You also have the right to request AVPRO to complete information you believe is incomplete.
- iii. **The right to erasure** – You have the right to request that AVPRO erase your personal data, under certain conditions.
- iv. **The right to restrict processing** – You have the right to request that AVPRO restrict the processing of your personal data, under certain conditions.
- v. **The right to object to processing** – You have the right to object to AVPRO's processing of your personal data, under certain conditions.
- vi. **The right to data portability** – You have the right to request for AVPRO to transfer your data we have collected to another organization, or directly to you, under certain circumstances.

Depending on where in the world your data was collected you may have additional data protection rights, including the following for Brazil and California.

- vii. **The right to know third party recipients** – You have the right to access information about entities with whom AVPRO has shared your personal data.
- viii. **The right to know the categories of data** – You have the right to access information on whether or not AVPRO holds particular data.

B. What are your rights in California?

In addition to the rights stated under the GDPR and LGPD, California residents and workers are afforded the additional following rights under the California Consumer Privacy Act ("CCPA"):

- i. **The right to opt-out** – You have the right to direct a business to stop

selling your personal data to a third party. (Please note that AVPRO does not sell personal data to third parties.)

- ii. **The right to non-discrimination** – You have the right to non-discrimination if you choose to exercise any of your privacy rights under the CCPA.

C. What are your rights in Nevada?

Under Nevada law, certain Nevada consumers may opt out of the sale of “personally identifiable information” for monetary consideration (as such terms are defined by Nevada law) to a person for that person to license or sell such information to additional persons. We do not engage in such activity; however, if you are a Nevada resident who has purchased or leased goods or services from us, you may submit a request to opt out of any potential future sales under Nevada law by contacting us using the contact information provided below, and including “NV Sale Opt Out Request” in the subject line. Please note we will take reasonable steps to verify your identity and the authenticity of the request. Once verified, we will maintain your request in the event our practices change.

12. Children

AVPRO does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Site or Products. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data through the Site or Products without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to AVPRO through the Site or Products, please contact us as indicated in the Contacting AVPRO section at the end of this document, and we will endeavor to delete that information from our databases.

13. Exclusions.

This Privacy Policy does not apply to any Personal Data collected by AVPRO other than Personal Data collected through the Site or Products. This Privacy Policy shall not apply to any unsolicited information you provide to AVPRO through the Site or Products or through any other means (without prejudice to your rights under the applicable law). This includes, but is not limited to, information posted to any public areas of the Site, such as forums (collectively, “Public Areas”), any ideas for new products or modifications to existing products, and other unsolicited submissions (collectively, “Unsolicited Information”). All Unsolicited Information shall be deemed to be non-confidential and AVPRO shall be free to reproduce, use, disclose, and distribute such Unsolicited Information to others without limitation or attribution.

14. Exercising your rights

If you make a request regarding your personal data, we have one (1) month to respond to

you. If you would like to exercise any of these rights, please contact us at:

Email: _____

Call us at: _____

Or write to us: _____

If you wish to be “forgotten” please complete and provide the following form to help us efficiently remove your personal data from our system. The link to the form is: _____.

You also have the right to lodge a complaint with your supervisory authority.

15. Contact Us

If you have any questions, comments, or concerns about how we handle your personal data, or if you believe AVPRO is processing your personal data unlawfully, please contact us through the following means:

Email: _____

Call us at: _____

Or write to us: _____

To exercise your rights please fill out the form that can be found at this link: _____

Your Right to Erasure Request Form can be accessed at this link: _____

16. Privacy policies on other websites

This Privacy Policy applies only to the Site and Products. The Site or Products may contain links to or otherwise interact with other web sites or products not operated or controlled by AVPRO (the “Third Party Sites/Products”), including third party add-ons, applications and other software that could track your usage or collect Personal Data. The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third-Party Sites and not by this Privacy Policy. We suggest contacting those third parties directly for information on their privacy practices and policies.

17. Updates to this Privacy Policy

AVPRO keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated March __, 2021.

18. California’s Shine the Light Law

California Civil Code Section 1798.83, known as the “Shine the Light” law, permits Users who are California residents to request and obtain from us a list of what personal data, if any, we disclosed to third parties for their direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Request may be made only once a year and are free of charge. Under Section 1798.83, AVPRO currently does not share any personal data with third parties for our own direct marketing purposes.