

Advanced Systems Concepts, Inc. | Privacy Policy  
Updated May 21, 2018

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## 1. Privacy Policy Overview

Advanced Systems Concepts, Inc. (herein referred to as “**Advanced Systems Concepts, Inc.**,” “**Advanced Systems Concepts**,” “**ASCI**,” “**we**,” and “**our**”) is committed to protecting your privacy. This Privacy Policy (“**Policy**”) explains how we may Process your information. This Policy governs our data collection, Processing, and usage practices. It also describes your choices regarding use, access, and correction of your Personal Information. By purchasing products or services from ASCI, using our Websites, or subscribing to our Marketing Communications, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not purchase products or services from ASCI, use the Websites, or subscribe to Marketing Communications.

ASCI owns, operates, and provides access to our websites ([www.advsyscon.com](http://www.advsyscon.com), [www.activebatch.com](http://www.activebatch.com), [www.itautomationsoftware.com](http://www.itautomationsoftware.com), [www.xlntscripting.com](http://www.xlntscripting.com)) (herein collectively referred to as the “**Website**”), including any subdomains and other online interactive features and services, including, but not limited to, marketing communication subscriptions, emails, newsletters, chat areas, forums, communities, surveys, and contests (collectively “**Services**”). This Policy applies to all information collected about you by ASCI,

regardless of how it is collected or stored, and describes, among other things, the types of information collected about you when you interact with the Services, how your information may be used, when your information may be disclosed, how you can control the use and disclosure of your information, and how your information is protected.

Except as otherwise noted in this Policy, ASCI is a data controller (as that term is used under the EU General Data Protection Regulation (“**GDPR**”)), which means that we decide how and why the information you provide to us is Processed. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of your information or changes in applicable law. We encourage you to read this Policy carefully and to regularly check this page to review any changes we may make.

If you have any questions about our Privacy Policy, you can contact us at [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) and include “Privacy Policy” in the subject line.

## 2. Types of Information Collected

We may Process your personal details (e.g., your name), contact details (e.g., your address, telephone number and email address), records of your consents, purchase details, details of your employer (where relevant), information about your interactions with our content or advertising and any views or opinions you provide to us. We may also Process information about you from your use of our Services (e.g., the type of device you are using, your internet service provider, etc.), including your interaction with the content and advertising on the Website and Services.

**Collection of Personal Information and Navigational Information.** You are free to explore the Website without providing any Personal Information; however, we may collect Navigational Information about your visit. If you choose to access certain materials or resources on our Website, registration to our Services may be required. Registration to our Services requires that you provide Personal Information about yourself in order to access selected materials. This information will be used to contact you with additional information and Marketing Communications, from which you can unsubscribe at any time, as outlined in this Privacy Policy.

**Personal Information.** “Personal Information” means information about any individual or from which any individual is directly or indirectly identifiable. “Personal Information” refers to any information that you voluntarily submit to us that identifies you personally, including contact information, such as your name, email address, company name, address, phone number, and other information about yourself or your business. Personal Information can also include information about any transactions, both free and paid, that you provide to us or enter on the Website and information that is publicly available on social media websites or on the internet.

**“Process,” “Processing,” or “Processed”** means anything that is done with Personal

Information, whether or not by automated means, such as collection, recording, organization, structuring, storing, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.

Categories of Personal Information that we Process include:

- Personal Details: Your name, username or login details, areas or topics of interest, and photograph.
- Demographic Information: salutation, job title, company information, work experience and other professional information, and language preferences.
- Contact Details: Postal address, telephone and/or mobile number, email address, and your public social media handle(s) or profile(s).
- Consent Records: Records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- Location Information: Location data that describes the geographic location of your device.
- Purchase and Payment Details: Records of purchases and prices, invoice records, payment records, billing address, payment method, cardholder or accountholder name, payment amount, and payment date.
- Employer Details: Where you interact with us in your capacity as an employee, the contact information of your employer (including name, address, telephone number, and email address).
- Views and Opinions: Any views and opinions that you or other users choose to send to us or publicly post about us on social media platforms or in the Services, including on forums administered by ASCI or any other party.

We also collect other kinds of information from you or other sources, which we refer to as “**Other Information**” in this Policy, which may include but is not limited to:

- Information about your use of the Services, such as usage data and statistical information, which may be aggregated.
- Browsing history including the websites or other services you visited before and after interacting with the Services.
- Non-precise information about the approximate physical location (for example, at the city or zip code level) of a user’s computer or device derived from the IP address of such computer or device.
- Device identification.
- Advertising identification.
- Internet Protocol (IP) address, which is a unique string of numbers automatically assigned to your device whenever you access the Internet.
- Internet connection means.

- Information collected through the use of cookies including information collected using such methods and technologies about your visits to, and interaction and engagement with, the Services, content, and ads on third-party websites, applications, platforms and other media channels and your interaction with emails including the content and ads therein.
- Device type, settings, and software used.
- Log files, which may include IP addresses, browser type, ISP referring/exit pages, operating system, date/time stamps and/or click data, including any clicks on customized links.
- Mobile analytics to understand the functionality of our Website and/or mobile applications on your phone.

Under certain circumstances and depending on applicable law, some of this Other Information may constitute Personal Information. Personal Information together with Other Information is herein referred to as “**User Information.**”

### 3. Sensitive Personal Information

We do not seek to collect or otherwise Process your Sensitive Personal Information. When we need to Process your Sensitive Personal Information for a legitimate purpose, we do so in accordance with applicable law. The Services are not intended for use by children.

We do not collect or otherwise Process Personal Information about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offenses or penalties, or any other information that may be deemed to be sensitive under GDPR (collectively, “Sensitive Personal Information”) in the ordinary course of our business. Where it becomes necessary to Process Sensitive Personal Information under GDPR, we would rely on one of the following legal bases:

- Compliance with Applicable Law: We may Process your Sensitive Personal Information where the Processing is required or permitted by applicable law.
- Detection and Prevention of Crime: We may Process your Sensitive Personal Information where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud).
- Establishment, Exercise, or Defense of Legal Rights: We may Process your Sensitive Personal Information where the Processing is necessary for the establishment, exercise or defense of legal rights.
- Consent: We may Process your Sensitive Personal Information where we have, in accordance with applicable law, obtained your expressed consent prior to Processing your Sensitive Personal Information.

**Children.** The Website and Services are not intended for use by children under the age of 18. No one under the age of 18 should provide any Personal Information or use our public

discussion areas, forums, or chats. Minors under the age of 18 are not permitted to make purchases through the Services or Website. If, notwithstanding these prohibitions, your children disclose information about themselves in our public discussion areas, consequences may occur that are not intended for children (for example, they may receive unsolicited messages from other parties). If it is discovered that we have collected Personal Information from someone under 18, we will delete that information. If you believe that we have collected information about a child under the age of 18, please contact us at [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) so that we may delete that information.

## 4. How We Collect Information

We may collect or obtain User Information about you directly from you (e.g., where you contact us), in the course of our relationship with you (e.g., if you make a purchase), when you make your Personal Information public (e.g., if you make a public post about us on social media), when you download, install, or use any of our Services, when you visit our Website, when you register to use any part of the Services, or when you interact with any third-party content or advertising on the Services. We may also receive User Information about you from third-parties (e.g., social network sites). We may also create User Information about you, such as records of your interactions with us. ASCI is not responsible for Personal Information you volunteer about yourself in public areas of the Services.

Collection of User Information: We may collect User Information about you from the following sources:

- **Data You Provide:** We may obtain your Personal Information when you provide it to us across our Services (e.g., where you sign up for emails, newsletters, bulletins, webinars, or white papers; register for site membership or create a profile or account on any part of the Services; enter a sweepstakes, contest, competition, or prize draw; participate in surveys; perform search queries through the Services; contact us via email, telephone or by any other means; purchase a subscription, software license, or product; when we scan your badge or you provide us information at a trade show, event, or conference; or when you provide us with your business card, etc.).
- **Relationship Data:** We may collect or obtain your Personal Information in the ordinary course of our relationship with you (e.g., if you purchase a product or service from us).
- **Data You Make Public:** We may collect or obtain your Personal Information that you clearly choose to make public, including via social media. We may collect information from your social media profile(s) if you make a public post about us or through our chats, forums, or communities on the Services.
- **Service Data:** We may collect or obtain your Personal Information when you visit, download, use or register to use any part of our Service.
- **Content and Advertising Information:** If you choose to interact with any third-party content or advertising on the Services or Channels, we may receive User Information about you from the relevant third-party.

- **Third-Party Information:** We may collect or obtain your Personal Information from third-parties who provide it to us. This may include social network sites or services (e.g., Facebook, Twitter, LinkedIn, etc.). If you use a third-party connection or login (e.g., Facebook Connect, Twitter, or Google+) to access the Services, create a membership or profile on any part of the Services, access our content or forward our content to another person, platform or service, we may also receive your username or email address from those third-party services or other information available about you or collected from you on those services.

Please note that ASCI is not responsible for the information you volunteer about yourself in the discussions in certain public areas of the Services, such as forums, blogs, chat service, private messages, message boards, or other publicly accessible interaction, or information that you choose to make public in your member profile or other areas of the Services that allow users to upload or post content. We discourage users from posting such Personal Information in this fashion. To request removal of your Personal Information from these areas, please use the channels outlined in this Policy to request that the information be removed. In some cases, we may not be able to remove your Personal Information, in which case we will let you know we are unable to do so and why. This Privacy Policy does not cover the practices of third-parties.

**Creation of User Information.** We may also create User Information about you, such as records of your interactions with us and details of your purchase history, for internal administrative purposes and analysis. We may also combine data you have provided to us with data obtained from third-parties such as social networks and other data collection entities.

## 5. Purposes For Which We May Process Your Information

Purposes for Which We May Process User Information, subject to applicable law , include:

- Providing the Services to you
- Communicating with you via any means (including, but not limited to, email, telephone, text message, social media, forum post, or in person) regarding news items, resources, and other information in which you may be interested (subject to ensuring that communications are provided to you in compliance with applicable law).
- Providing advertising based on your interests and interactions, including using User Information.
- Obtaining your prior, opt-in consent where required.
- Marketing to current and prospective customers and their employees who have indicated an interest in doing business with, or have previously conducted business with, ASCI in order to further generate and promote our business. Such efforts include, but are not limited to, sending marketing emails or conducting phone calls.
- Engaging with you for the purposes of obtaining your views (surveying).
- Maintaining and updating your contact information where appropriate.

- Posting of your personal testimonial alongside other endorsements and display of personal reviews of products and services.
  - Customer support and relationship management.
  - Identification and development of audience engagement, advertising, and promotional strategies on various platforms and channels.
  - Tracking purchase and Website activity.
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- Administration of ASCI information technology (IT) systems, network and device administration, network and device security, implementing data security and information systems policies, compliance audits in relation to internal policies, identification and mitigation of fraudulent activity, and compliance with legal requirements.
  - Electronic security measures (including monitoring of login records and access details) to help mitigate the risk of and provide the ability to identify and rectify a security incident.
  - General business and financial management purposes, including financial and administrative management; planning and reporting; personnel development; sales, accounting, finance, and other corporate audits; and compliance with legal requirements
  - Detecting, investigating and preventing breaches of policy, and criminal offenses, in accordance with applicable law.
  - Establishing, exercising, and defending legal rights.
  - Subject to applicable law, we reserve the right to release information concerning any user of Services when we have grounds to believe that the user is in violation of our Terms of Use or other published guidelines or has engaged in (or we have grounds to believe is engaging in) any illegal activity, and to release information in response to court and governmental orders, other requests from government entities, civil subpoenas, discovery requests and otherwise as required by law or regulatory obligations. We also may release information about users when we believe in good faith that such release is in the interest of protecting the rights, property, safety, or security of ASCI, any of our users, or the public, or to respond to an emergency.

## 6. Direct Marketing

We may Process your User Information to contact you with information regarding services that may be of interest to you. You may unsubscribe for free or opt out of messages at any time. We may Process your User Information to contact you via email, telephone, direct mail, SMS, or other methods of communication to provide you with information regarding the Services that may be of interest to you. We may send information to you regarding the Services, upcoming promotions, and other information that may be of interest to you, using the contact details that you have provided to us in compliance with applicable law. You may unsubscribe from our email lists at any time by following the unsubscribe instructions included in every marketing email we send. We will not send you any marketing emails from a list you have selected to be

unsubscribed from, but we may continue to contact you to the extent necessary for the purposes of any other Services you have requested or for additional emails you have signed up for. You may opt out of any telephone marketing by contacting us at the contact details set out in this Policy.

## 7. Cookies, Social Media, Similar Technologies, Online Advertising, and Website Links

ASCI uses cookies or similar technologies to analyze trends, administer the Website, track users' movements around the Website, and gather demographic information about our user base. We use cookies to help personalize your online experience. A cookie is a text file that is placed on your hard disk by a web server. Cookies are not used to run programs on your computer. Cookies are uniquely assigned to you and can be read by a web server in the domain that issued the cookie to you. Cookies can provide convenience for the Website user. The purpose of a cookie is to tell the web server that you have returned to a specific page. For example, a cookie helps to recall your specific information on subsequent visits. You can usually modify your browser settings to decline cookies if you prefer; however, if you choose to decline cookies, you may not be able to fully experience the interactive features of the Website.

ASCI may collect information about you for online behavioral advertising purposes in order for you to receive relevant interest-based advertising on the Services and on other websites, platforms and media channels. We use online data as well as other User Information to send you advertisements. Online Data is aggregated with the Other Information and data we collect and/or similar data collected by partners to create groups of users and certain general-interest categories or segments that we have inferred. We use this information to get a more accurate picture of audience interests in order to serve ads we believe are more relevant to your interests.

ASCI uses internet-based strategies including pay-per-click advertising to provide you with targeted advertising based on your interests. Vendors such as Google, Bing, Yahoo, and others use cookies to collect information on visitors using their services. Any information that is gathered and made available by these and other similar vendors is anonymous, and, alone, it cannot be used by ASCI to identify you. ASCI and some of our advertisers may use third-party advertising service companies to serve advertisements and perform related services when you interact with the Services. Often, these third-party advertising companies employ cookies and other technologies to measure the effectiveness of websites, app and email advertisements, and to create a record of interaction with our content that they use in conjunction with their advertising which appears on other sites or applications, or for reporting website traffic, app use, statistics, advertisement data, and/or other activities on the Services. We also engage third-party providers to assist with the segmentation of this data.

Our Website includes Social Media Features, such as "Facebook Like" buttons and widgets,



“Share This” buttons, etc. These features may collect your IP address, collect which page you are visiting on our Website, and may set a cookie to enable the feature to function properly. Social Media Features and Widgets are either hosted by a third-party or hosted directly on our Website. This Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

Our Website provides links to other websites. We do not control and are not responsible for the content or practices of other websites. Our provision of such links does not constitute our endorsement of other websites, their content, their owners, or their practices. This Policy does not apply to other websites, which are subject to any privacy or other policies they may have.

ASCI offers publicly accessible message boards, blogs, and community forums. If you directly disclose any information through our public message boards, blogs, or forums, this information may be seen, collected, and/or used by others. We will correct or delete any information you have posted on the Website, if you so request, in the manner described in this Privacy Policy.

## 8. Lawful Basis for Processing Personal Information

We may Process your User Information where you have given your consent; the Processing is necessary for a contract between you and us, the Processing is required by applicable law, the Processing is necessary to protect the vital interests of any individual, or where we have a valid legitimate interest in the Processing. In Processing your User Information in connection with the purposes set out in this Policy, we may rely on one or more of the following legal bases, depending on the circumstances:

- **Consent:** We may Process your User Information where we have obtained your prior, express consent to the Processing.
- **Contractual Necessity:** We may Process your User Information where the Processing is necessary in connection with any contract or agreement that you may enter into with us.
- **Compliance with Applicable Law:** We may Process your User Information where the Processing is required by applicable law.
- **Vital Interests:** We may Process your User Information where the Processing is necessary to protect the vital interests of any individual.
- **Legitimate Interests:** We may Process your User Information where we have a legitimate interest in carrying out the Processing for the purpose of managing, operating, or promoting our business, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms.

## 9. What Information We Disclose to Third-Parties

We may disclose your User Information to: legal and regulatory authorities, our external advisors, parties who Process User Information on our behalf (“Processors”), any party as necessary in connection with legal proceedings, or any party as necessary for investigating, detecting or preventing criminal offenses.

We may disclose your User Information to other entities within the Company group, for legitimate business purposes (including operating the Services, and providing services to you), in accordance with applicable law.

In addition, we may disclose your User Information to:

- Legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation.
- Outside professional advisors (such as accountants, auditors, or lawyers), subject to binding contractual obligations of confidentiality.
- Third-party Processors (such as analytic providers; data centers; etc.), located anywhere in the world.
- Any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights;
- Any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offenses or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security.
- Any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution, or liquidation).
- And third-party vendors involved in the administration of such events (only when necessary and when advanced written permission has been provided).

We may engage third-party providers to assist with the collection, storage, and segmentation of data, and the providers are required to maintain the confidentiality of this information. These third-party providers may collect User Information from our Services for their own purposes. If we engage a third-party Processor to Process your User Information, the Processor will be subject to obligations to only Process the User Information in accordance with our prior written instructions and use measures to protect the confidentiality and security of the User Information, together with any additional requirements under applicable law. ASCI uses Third-Party Service Providers including, but not limited to, customer relationship management (CRM) systems, marketing automation systems, learning management systems (LMS), website analytics tools, lead-retrieval systems, and website chat systems. We maintain a file on each of our Third-Party Service Providers, which may include things like their privacy policies, GDPR compliance statements, and E.U.-U.S. Privacy Shield Compliance documentation. You may request a copy of a third-party vendor’s privacy-related policies by sending an email with your request to [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) or by sending a letter with your request to Advanced Systems Concepts, Inc., 1180 Headquarters Plaza, West Tower, Fourth Floor, Morristown, New Jersey, 07960, USA, Attention: Privacy. Advanced Systems Concepts, Inc. uses

a third-party Processing system for credit card orders placed on our Website; Advanced Systems Concepts, Inc. does not store credit card information on our servers.

With respect to surveys, in the event that responses are publicly disclosed, users will be notified at the time they take the survey. Otherwise, we will disclose only aggregate information regarding users' responses in surveys to other participants in the survey. Where surveys allow users to submit written comments, and where ASCI advises users of the possibility of such disclosure at the time they take the survey; ASCI reserves the right to disclose any information provided by users, provided that no User Information identifying a specific user is disclosed.

## 10. Data Security and Protection

We implement appropriate technical and organizational security measures to protect your User Information. Please ensure that any Personal Information that you send to us is sent securely. We have implemented appropriate technical and organizational security measures designed to protect your User Information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of Processing, in accordance with applicable law. We cannot guarantee there will not be a breach, and we are not responsible for any breach of security or for the actions of any third-parties. Because the internet is an open system, the transmission of information via the internet is not completely secure. Although we will implement reasonable measures to protect your information, we cannot guarantee the security of your data transmitted to us using the internet. Any such transmission is at your own risk and you are responsible for ensuring that any Personal Information that you send to us are sent securely.

Advanced Systems Concepts, Inc. will never sell your Personal Information to any third-party. Advanced Systems Concepts, Inc. will never publicize your Personal Information without your proper advanced written consent. Advanced Systems Concepts, Inc. does not make its user or mailing lists available to anyone outside of Advanced Systems Concepts, Inc. for purposes except what is outlined in this Policy. Advanced Systems Concepts, Inc. does not buy lists or data from third-parties and only uses data provided by those visitors who request information.

## 11. Data Accuracy, Minimization, and Retention

ASCI takes every reasonable step to ensure that your User Information that we Process is accurate and, where necessary, kept up to date, and any of your User Information that we Process that you inform us is inaccurate is erased or rectified. ASCI takes every reasonable step to limit the volume of your User Information that we Process to what is necessary.

## 12. Reviewing, Correcting, and Removing Your Personal Information For EU Individuals: Your Rights Under the General Data Protection Regulation

If you are an EU resident, you have certain rights. Upon request, ASCI will provide you with information about whether we hold any of your Personal Information. If you provide us with your Personal Information, you have the following rights with respect to that information:

- To not provide your Personal Information to us (in which case we may not be able to provide you with some of the features and functionality of our Website or Services).
- To review the information that you have supplied to us.
- To request that we correct any errors, outdated information, or omissions in information that you have supplied to us.
- To request that your information not be used to contact you.
- To request that your information be removed from any solicitation list that we use.
- To request that your Personal Information be deleted from our records.
- To object to the Processing of your Personal Information.
- To lodge complaints with supervisory authorities.

We may require proof of your identity before we can give effect to these rights. Please note that withdrawal of consent does not affect the lawfulness of any Processing performed prior to the date on which we receive notice of such withdrawal and does not prevent the Processing of your Personal Information in accordance with any other available legal bases.

You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law. In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

## 13. ASCI Contact Information and Unsubscribing

To exercise any of your rights, in accordance with applicable laws and regulations, please contact us by sending an email with your request to [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) or by mail to Advanced Systems Concepts, Inc., 1180 Headquarters Plaza, West Tower, Fourth Floor, Morristown, New Jersey, 07960, USA, Attention: Privacy. We will respond within a reasonable

timeframe and notify you of the action we have taken.

You may unsubscribe at any time from our Marketing Communications Services by clicking on the “Email Preferences” link located at the bottom of our marketing emails, by sending an email with your request to [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com), or by sending a letter with your request to Advanced Systems Concepts, Inc., 1180 Headquarters Plaza, West Tower, Fourth Floor, Morristown, New Jersey, 07960, USA, Attention: Privacy. To be placed on our do-not-call list, you may send an email with your request to [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) or mail a letter with your request to Advanced Systems Concepts, Inc., 1180 Headquarters Plaza, West Tower, Fourth Floor, Morristown, New Jersey, 07960, USA, Attention: Privacy.

## 14. Transactional Communications

Users cannot opt out of receiving Transactional Communications including emails and telephone calls directly related to their account with us. Transactional Communications are defined as those that result from or complete a transaction or other Process triggered by or as a result of an action by a user. Examples of Transactional Communications include, but are not limited to, communications with our Technical Support personnel regarding cases you’ve submitted, order confirmations, password resets, purchase receipts, invoices, and collections efforts. If your company has licensed a product, is evaluating a product, has ongoing support services, has an ongoing training course, or has other similar circumstance, we must maintain access to provide you the services and support for which your company has contracted with us. If you are an ASCI customer and would like to be removed from our list for Transactional Communications, we require the name of a replacement individual to ensure continuity of services as required; you may send such requests to [admin@advsyscon.com](mailto:admin@advsyscon.com).

## 15. For EU and Swiss Individuals: Privacy Shield Notice for Personal Data Transfers to the United States

ASCI complies with the EU-US Privacy Shield Framework and the Swiss-US Privacy Shield Framework as set forth by the US Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland transferred to the United States pursuant to Privacy Shield. ASCI has certified that it adheres to the Privacy Shield Principles with respect to such data. If there is any conflict between the policies in this privacy policy and data subject rights under the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit the [Privacy Shield website](#).

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, ASCI is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission.

Pursuant to the Privacy Shield Frameworks, EU and Swiss individuals have the right to obtain our confirmation of whether we maintain personal information relating to you in the United States. Upon request, we will provide you with access to the personal information that we hold about you. You may also may correct, amend, or delete the personal information we hold about you. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data transferred to the United States under Privacy Shield, should direct their query to [privacy\\_assistance@advsycon.com](mailto:privacy_assistance@advsycon.com). If requested to remove data, we will respond within a reasonable timeframe.

We will provide an individual opt-out or opt-in choice before we share your data with third parties other than our agents, or before we use it for a purpose other than which it was originally collected or subsequently authorized. To request to limit the use and disclosure of your personal information, please submit a written request to [privacy\\_assistance@advsycon.com](mailto:privacy_assistance@advsycon.com).

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

ASCI's accountability for personal data that it receives in the United States under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, ASCI remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless ASCI proves that it is not responsible for the event giving rise to the damage.

In compliance with the Privacy Shield Principles, ASCI commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to Privacy Shield. European Union and Swiss individuals with Privacy Shield inquiries or complaints should first contact ASCI by email at [privacy\\_assistance@advsycon.com](mailto:privacy_assistance@advsycon.com).

ASCI has further committed to refer unresolved privacy complaints under the Privacy Shield Principles to an independent dispute resolution mechanism, the BBB EU PRIVACY SHIELD, operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-privacy-shield/for-eu-consumers](http://www.bbb.org/EU-privacy-shield/for-eu-consumers) for more information and to file a complaint. This service is provided free of charge to you.

If your Privacy Shield complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See Privacy Shield Annex 1 at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

## 16. Changes To This Privacy Policy

We may change this Policy from time to time, and all changes will be effective at the time we post them. If we believe there is a change to this Policy or our data collection and use practices that ASCI deems significant, we will communicate those changes on the Website and through email. Your continued access to or use of any of the Services shall be deemed your acceptance of the Policy. We urge you to come back to this webpage and review this Policy regularly so that you remain aware of the terms and conditions that apply to you.

## 17. Questions

If you have any questions about this Policy or our treatment of the information you provide us, please write to us by email at [privacy\\_assistance@advsyscon.com](mailto:privacy_assistance@advsyscon.com) or by mail to Advanced Systems Concepts, Inc., 1180 Headquarters Plaza, West Tower, Fourth Floor, Morristown, New Jersey, 07960, USA, Attention: Privacy.