



Vitech Systems Group Privacy Policy

This Privacy Policy provides information about data we collect, use, and share, and our commitment to using the personal information we collect in a respectful fashion.

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1. About Vitech

Vitech Systems Group and its affiliates, which you have a contract with or which provide services to you, (collectively or individually, as applicable, referred to as "Vitech", "Company", "we", "our", "us") is a global provider of cloud-native benefit and investment administration software. Through our V3locity® platform, we help our Group Insurance, Pension Fund Administration, and Investment clients expand their offerings and capabilities, streamline their operations, gain analytical insights, and transform their engagement models. Vitech is headquartered in New York City and employs over 1,500 professionals, serving over 100 of the world’s most successful insurance, retirement, and investment organizations.

We are dedicated to helping our clients improve their market agility, raise their service levels and streamline their operations while consolidating and modernizing their legacy administration platforms.

For more information about Vitech, please see the “About” section of our website. at www.vitechinc.com.

2. Scope of this Policy

Vitech respects your right to privacy. This Privacy Policy explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy is not a contract and does not create any legal rights or obligations. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.



We may update this Privacy Policy from time to time in response to changing legal, technical, or business developments. When we update our Privacy Policy, the updated version will be posted on our website. If and where your consent is required by applicable data protection laws, we will obtain your consent to any material Privacy Policy changes.

The information below provides an overview of how we protect your privacy.

3. What personal information does Vitech collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

We may ask you to provide certain information voluntarily, such as your contact details, user credentials, and employment information. For instance, this can be by way of filling in an online form when you register to request to receive information from us, when you register to attend an event, when you provide us with your business card information or when you use our products and services. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information:	Why we collect it:
Billing information	To maintain your account with us.
Contact details including name, telephone numbers, email address, and postal address.	To respond to correspondence and enquiries you send us. In some cases, to gather information needed to provide products and services requested by you or your employer. To obtain your feedback regarding our products and services.
User credentials including name, email address, and personal information you provide to us in a profile.	To set up and maintain your user account. To monitor and enforce compliance with our contractual terms.
Employer and employment information such as job title, function, seniority, department, and the address/ city / country of your office.	To manage your individual user account which is covered by a corporate account of one of Vitech's corporate customers, for instance, the corporate account of your employer.
Your preferences and interests, for instance which newsletters you would like to be subscribed to or what markets you are interested in.	To enable us to send you tailored information on our products and services across our companies that may be of interest to you.



Credit card numbers and bank account numbers. We refer to this type of personal data as "Sensitive Financial Data".	We do not collect sensitive personal information from our customers.
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Information that we collect automatically

We may also collect certain information automatically from your device, including information regarding your use patterns of our products and services. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), "click stream" data and other technical information. We also collect information about how your device has interacted with our websites and products, including the pages and products accessed, and links clicked.

Collecting this information enables us to better understand the visitors who come to our website and the users of our products and services, where they come from, and what content on our website and products and services is of interest to them. We use this information:

- for our analytics purposes;
- to improve the quality and relevance to users, of our websites and products and services;
- to develop and update our websites and products and services;
- for customer services purposes, for instance, reviewing our customers' training needs in respect of the use of our products;
- to satisfy Vitech's corporate customers' requests regarding the use of our products and services by the individual users licensed by their corporate account (please note that such information in many instances and jurisdictions will be offered to clients in an aggregated form); note that customers may be required by law to request such information from Vitech;
- to send you tailored information on our products and services that we believe may be of interest or value to you and also marketing and promotional e-mails with your consent if and when required by applicable law;
- on rare occasions to identify unauthorized use or unauthorized distribution of our products and services related or unrelated to a security issue;
- where relevant, to review and / or update our pricing model agreed with our corporate customers; and
- for billing purposes, so that we are able to bill for the services provided.



Some of this information may be collected using cookies and similar tracking technology. We use cookies and similar tracking technology (collectively, “Cookies”) to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including your employer or business partner if you use Vitech's products covered by their corporate subscription), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from your employer (if you use Vitech products under your employer's corporate contracts and support agreements) consists of your contact details and employment information.

The types of information we collect from other third parties include information regarding you as a marketing prospect. For example, we may collect personal information from marketing vendors, social media sources, third party conferences, and other sources to the extent permitted by applicable law. We use the information we receive from these third parties to market our products and services across our lines of business to you, to supplement personal information we have for purposes such as maintaining and correcting our records, adding supplemental data fields, and similar reasons to enhance the delivery of our products and services to you.

4. Do we share your information with outside parties?

- **Our Group Companies.** We provide personal information to our related group companies who process personal information for purposes in line to those described in this Privacy Policy or notified to you when we collect your personal information.
- **Third Party Service Providers.** We provide personal information to third party service providers who provide data processing services to us. We do not sell your usage data to third parties for the purposes of their marketing third party products or services to you.
- **For Business Transaction or Reorganization Purposes.** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- **Law Enforcement Bodies and Legal Obligations.** We may disclose personal information to third parties, such as law enforcement and legal advisors:
 - in connection with the establishment, exercise, or defense of legal claims;



- to comply with laws or to respond to lawful requests and legal process;
 - to protect the rights and property of us, our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us; or
 - to protect the health and safety of us, our customers, or any person
- **Other Persons, with Your Consent.** We may disclose personal information about you to certain other third parties with your consent

Please be aware that if you disclose personal information on website message boards or chat areas, that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond the control of Vitech.

5. How does Vitech keep my personal information secure?

The security of your personal information is important to Vitech and we use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. We use industry standard technologies and maintain current security standards to ensure that your personal information is protected against unauthorized access, disclosure, inappropriate alteration, or misuse.

We manage our server environment appropriately and our firewall infrastructure is strictly adhered to. We routinely employ current technologies to ensure that the confidentiality and privacy of your information is not compromised.

6. What are my data protection rights?

Upon request Vitech will provide you with information about whether we hold, or process on behalf of a third party, any of your personal information. If you have any questions or concerns about our use of your personal information, please contact our Chief Privacy Officer at privacy@vitechinc.com or Chief Privacy Officer, Vitech Systems Group, 401 Park Ave South, New York, NY 10016.

Your rights include the right to access, correct, update or request deletion of your personal information. You also have the right to withdraw the consent you have provided to us. You have the following data protection rights:

- to access, correct, update or request deletion of your personal information.
- you can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information.



- to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. If you registered under multiple addresses you will need to enter each address you wish to unsubscribe. An email will be sent to the address provided in order to ensure that the unsubscribe request is valid. If you are unable to access our subscription status page, you may send an email to privacy@vitechinc.com and we will notify you of your subscription status. Please be sure to send your request from the email address you wish to unsubscribe or clearly state in the email body the email address you wish to unsubscribe.
- if we have collected and processed your personal information with your consent, then 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 information conducted in reliance on lawful processing grounds other than consent.
- to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

7. Cookies and Other Tracking Technologies (“Cookie Notice”)

This Cookie Notice explains how we use cookies and similar technologies to recognize you when you visit our website. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information. Cookies set by the website owner (in this case, Vitech) are called "first party cookies".

Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We use first party and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Website. Third parties serve cookies through our Website for advertising, analytics and other purposes. This is described in more detail below.



The specific types of first and third-party cookies served through our Website and the purposes they perform are described below (please note that the specific cookies served may vary depending on the specific Website you visit):

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Website or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Website to another, to deliver or communicate with cookies, to understand whether you have come to our Website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Do you use Flash cookies or Local Shared Objects?

Our Website may also use so-called "Flash Cookies" (also known as Local Shared Objects or "LSOs") to, among other things, collect and store information about your use of our services, fraud prevention, and for other site operations.

If you do not want Flash Cookies stored on your computer, you can adjust the settings of your Flash player to block Flash Cookies storage using the tools contained in the Website Storage Settings Panel. You can also control Flash Cookies by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash Cookies (referred to "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash Cookies that are not being delivered by the operator of the page you are on at the time).

Please note that setting the Flash Player to restrict or limit acceptance of Flash Cookies may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our services or online content.

Do you serve targeted advertising?

Third parties may serve cookies on your computer or mobile device to serve advertising through our Website. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details, or other personally identifying details unless you choose to provide these.



How can I control cookies? You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our Website may be restricted. To learn how to manage your cookies, please follow the instructions from your specific browser.

If you are visiting this site using a mobile device such as a smartphone or tablet, please refer to the manufacturer's instructions on how to manage cookies.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

How often will you update this Cookie Notice?

We may update this Cookie Notice from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Notice regularly to stay informed about our use of cookies and related technologies.

Where can I get further information?

If you have any questions about our use of cookies or other technologies, please contact our Chief Privacy Officer at privacy@vitechinc.com or Chief Privacy Officer, Vitech Systems Group, 401 Park Ave South, New York, NY 10016.

8. General Data Protection Regulation ("GDPR")

Vitech is committed to complying with the General Data Protection Regulation. GDPR expands the privacy rights of individuals based in the European Economic Area ("EEA"), and places new obligations on all organizations that handle personal information of these individuals. This section provides helpful information on your rights as an individual based in the EEA, and how and why we use your personal information.

Your Rights Under GDPR

If you reside in the European Economic Area ("EEA"), you have the right as a data subject to exercise the following rights by contacting us via the email and postal address in Section 12 below:

- Right of access – you can request access to your personal information and information about how we process it
- Right to rectification – you can request to have your personal information corrected if it is inaccurate and/or outdated and to have incomplete personal information completed
- Right to withdraw consent – you can withdraw consent at anytime if you have previously consented to a certain processing of your personal information (e.g., withdrawing consent previously given to send you marketing communications).



- Right to erasure (also known as the Right to be Forgotten) – you can request to have your personal information erased, where applicable (e.g., if personal information is no longer necessary in relation to the purposes for which it was collected/processed).
- Right to restriction of processing – you can restrict the processing of your personal information in certain situations (e.g., if the accuracy of your personal information is contested).
- Right to data portability – you have the right to receive your personal information electronically in a standard format to transmit it to another controller, where applicable (e.g., if processing is based on your consent).
- Right to object – you have the right to object to processing of your personal information
- Rights regarding automated individual decision making, including profiling – you have the right to not be subject to a decision based solely on automated individual decision making, including profiling.
- Right to lodge a complaint – you have the right to lodge a complaint with a data protection supervisory authority if you believe we are mishandling your personal information under the GDPR requirements.

Depending on your interaction with Vitech, we may act as a Processor of your personal information. A Controller determines the purposes and means of the processing of personal information while a Processor processes personal information on behalf of the controller. If we receive your personal information from our customers, please contact our customer directly with your data subject access request. Since we act as a Processor for our customers, they are better equipped in assisting you with your request. We will reasonably support our customers in fulfilling your request.

9. Purpose of Using and Sharing Your Personal Information

Under GDPR, we can use and share your personal information only where we have a proper reason to do so. These reasons, known as legal basis, include:

- Contract Performance/Fulfillment - your personal information is processed in order to fulfill a contractual agreement. For example, we may use your name and email address to setup a Vitech account after your purchase of our product.
- Consent – We can process your personal information if you provide us with consent to do so. For example, we will send you marketing communication after you provide us with your consent.
- Legitimate Interests – Using your personal information for legitimate interests help Vitech to streamline processes, improve products and services, and to provide an enjoyable user experience while protecting your personal information.
- Legal Obligation – We will disclose your personal information if we are required to do so by law. This may include sharing your information for law enforcement purposes.
- Protecting Data Subject and/or Others – We may disclose personal information if such disclosure is in your vital interest or others.

10. International Transfer of Personal Information Collected



Your personal information may be processed in countries outside of the EEA. Your personal information may be transferred to and stored by us in the United States and in other countries in which we operate. If your personal information is transferred outside the EEA, we will protect your data by ensuring the recipient has adequate levels of protection in place (e.g., executing Standard Contractual Clauses with the recipient).

11. California Consumer Privacy Act (“CCPA”)

If you are a California resident (“Consumer”), you can exercise certain rights under the CCPA. In addition to the details in this Policy, the CCPA requires us to provide you with the following information. In particular, our Web site may have collected the following categories of personal information from its Consumers within the last twelve (12) months:

Category: A. Identifiers

Examples: A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.

Collected: YES

Category: B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).

Examples: A name, signature, Social Security Number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.

Collected: YES

Category: C. Protected classification characteristics under California or federal law.

Examples: Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Collected: YES

Category: D. Commercial information.

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Collected: YES

Category: E. Biometric information

Examples: Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise



data.

Collected: NO

Category: F. Internet or other similar network activity.

Examples: Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.

Collected: YES

Category: G. Geolocation data.

Examples: Physical location.

Collected: YES

Category: H. Sensory data.

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Collected: NO

Category: I. Professional or employment-related information.

Examples: Current or past job history or performance evaluations.

Collected: YES

Category: J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).

Examples: Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

Collected: NO

Category: K. Inferences drawn from other personal information.

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Collected: YES

Please note we do not collect all the personal information listed as examples above. They are listed to provide you with more information on what each category includes.

Further, CCPA does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information;
- Information excluded from the CCPA's scope, such as: health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.



We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, when you provide us with information.
- Directly and indirectly from activity on our Web site. For example, from submissions through our Web site or website usage details collected automatically via tracking technologies (e.g., cookies).

Sharing Personal Information

We may disclose your personal information to a third-party service provider for a business purpose. When we disclose personal information for a business purpose, we enter into a contract with these service providers to ensure they keep personal information confidential and not use it for any purpose except for those stated in the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

Your Rights and Choices

The CCPA provides California residents with specific rights regarding their personal information. Depending on the capacity in which you provide your personal information to us, you may exercise your CCPA rights as outlined below:

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:



- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at privacy@vitechinc.com
- Sending us mail at the postal address in Section 12

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If we are unable to verify your identity based on your request, we will reach out to you for additional information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.



Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

12. Updating this Privacy Policy

We may update this Privacy Policy to reflect changes to our information practices. If we make any material changes that will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this Site prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

For additional information on this Privacy Policy, please send your inquiries to either:

- privacy@vitechinc.com; or
- Vitech Systems Sub LLC
401 Park Avenue South
New York, New York 10016

Last Updated: The 18th Day of August 2021