

Fusix Networks Privacy Statement

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Fusix Networks B.V. values the privacy of its customers and uses its best effort to comply with all applicable data protection laws and regulations, including the EU General Data Protection Regulation ("GDPR"). The GDPR gives individuals within the European Union more insight into how enterprises use their personal data, and it also gives individuals rights to their data. You can learn more about GDPR by visiting the European Commission's information site at www.europa.eu/dataprotection.

In this Policy you will read about privacy management principles that we apply to information that Fusix Networks B.V. ("Fusix, "we" "our") receives from Data Subjects ("individuals", "you", "yours") as a part of provisioning of our services and when we collect your data or you provide your data to us via our websites or e-mail.

Please read this Statement carefully so that you understand your rights in relation to your personal data, and how we will collect, use and process it. If you do not agree with this Privacy Statement in general or any part of it, you should not access our websites and use our services.

PRIVACY POLICY WITH REGARD TO FUSIX SERVICES

We provide data transport over Internet and Ethernet and Network consultancy services such as design, deployment, management and troubleshooting of IP networks for our clients. We operate in the business-to-business market, which means that our clients and suppliers are companies, rather than individuals.

On the global Internet, all independent IP networks (that are called an "ISP") announce to the other ISPs IP address blocks, for which the announcing ISP wants to receive IP-packets. We announce own IP address blocks, but – since we provide Internet access services to our clients who are also ISPs with their own IP address blocks – we announce the IP address blocks of our client-ISPs as well. In essence, our data transport service is to receive IP-data packets for our clients and send out IP-data packets that our clients or their customers requested to deliver to IP addresses that are announced by a third party ISP.

We monitor performance of our services and provide this information to our clients. To be able to do so, we develop our network management software and integrate various open source network monitoring tools (for example LibreNMS, NFSEN and Oxidized) that collect 'Network Flow Data'. Network Flow Data is digital records ("metadata") that describe and characterize connections made over an IP network, including elements such as IP addresses and port numbers for source and destination endpoints, protocols, used bandwidth, timestamps and network interfaces, but excluding the content ("payload") of communication between the endpoints.

Although in specific circumstances an IP address is a personal data, we would like to stress that our Network Flow Data contains only public IP addresses that are announced by us and by other ISPs on the Internet. We do not distribute IP addresses to individuals, which process is in the hands of a company that provides Internet access to your personal devices, such as mobile phone, computer and tablet.

With regard to all services that we provide, Fusix does not collect or process any personal data, therefore our provision of these services to our clients does not qualify as 'processing' of 'Personal Data' as this term is used in the GDPR, and the obligations that are incumbent upon a Data Processor or a Data Controller do not apply to Fusix with respect to any personal data that you may transmit via Internet.

We would like to stress that in general, transmission of information via Internet is not secure and to encourage you and all our clients to take active measures (such as VPN and encryption) to protect the security of any sensitive data that is being transmitted over the Internet.

PRIVACY POLICY WITH REGARD TO FUSIX WEBSITES

For the personal information that we collect from you, or you provide to us, in connection with your browsing of the Fusix websites: www.fusix.nl and <https://www.linkedin.com/company/fusix-networks-bv> ("Websites"), we are the Data Controller.

Do we use cookies?

We use cookies to collect information about your browsing activities over time and across different portions of the Websites. They allow us to recognize and count the number of users and to see how users

move around the Website when they are using it. This helps us to improve the services we provide to you and the way the Websites work. You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org>

We also use Google Analytics, which is a web analytics tool that helps us understand how users engage with the Websites. Like many services, Google Analytics uses first-party cookies to track user interactions as in our case, where they are used to collect information about how users use our site. This information is used to compile reports and to help us improve our Websites. The reports disclose website trends without identifying individual visitors. You can opt out of Google Analytics without affecting how you visit our site – for more information on opting out of being tracked by Google Analytics across all websites you use, visit this Google page: <https://tools.google.com/dlpage/gaoptout>

WHAT PERSONAL DATA DOES FUSIX PROCESS, AND WHY?

In this section you will find a summary of the personal data that we collect, where we receive it from and for which purpose we process it.

Business Contact Personal Data

As a part of the process to install, provide and maintain our services, if you represent our client or supplier, we request your contact information for business-related communication, billing and technical service announcements. This information constitutes your personal data as defined by the GDPR (“Business Contact Personal Data”).

When you provide your Business Contact Personal Data to us, we are the Data Controller. We process your data in accordance with a contract that we have with the company that you represent.

We will process Business Contact Personal Data as is necessary to maintain our business relationships and to meet our obligations to our clients and suppliers in accordance with the terms of the data protection provisions contained in the relevant contracts. As part of these provisions, we request that all our customers and suppliers provide a copy of this Fusix Privacy Statement to each individual for whom they have provided Business Contact Personal Data to us.

Business Contact Personal Data:

Information:	Name, Surname, e-mail address, telephone number (office and/or mobile), e-mail address
Source:	From your employees who maintain business communication with Fusix
Purpose:	We need to contact representatives of our suppliers and customers and to communicate with them with regard to business-related matters, such as for example, delivery of Fusix services, service-maintenance notifications, billing, request a service quote etc.
Legal ground	On our legitimate interest to communicate with our customers and suppliers via their employees in relation to the provision of services and to business-relevant matters.
Sub-processors	Our sub-processors are providers of business tools for invoicing and accountancy (“Exact On-line” and “Money Bird”), for ticket management (“Kayako”) and a software consultancy company “Digibites”.

Basic personal information for marketing and public communication:

Information:	Name, Surname, e-mail address
Source	From members of the public, when they sign up for our Company News Letter by submitting a subscription form on our web-site or by communication (oral or via e-mail) with our representative.
Purpose	The purpose of our news letters is to make sure that people who are interested can read about our service improvements and receive invitations to the Fusix events, such as for example Fusix Customer Workshops where we share our expertise in the field of IP networking. You can opt-out from the News Letter at any time by using the “unsubscribe” link that we add to each Letter.
Legal ground	On the consent given by each individual when signing up for the News Letter. Consent can be withdrawn and recipients can unsubscribe at any time.
Sub-processors	We use “Mail.Chimp” for subscriber database and e-mailing out or News Letter.

Basic personal information provided via on-line communication:

Information:	Name, Surname, e-mail address and other personal information that an individual has chosen to add, when contacting Fusix via our web-site forms or via an e-mail.
Source	From members of the public, when they contact us via our web-site at fusix.nl or via an e-mail to our public contact e-mail addresses. For example, individuals may send a job-application or a question.
Purpose	We use the data to respond to the on-line queries that we receive.
Legal ground	On the consent given when sending information over an online form or e-mail.
Sub-processors	We use "Kayako" ticket-management tool.

Information sent to us by your computer, mobile phone or other Internet access device when you visit our Websites

Information	Host name (if configured on your Internet access device), number of website visits from the same host, visited web-pages, duration of your browsing through our Websites, device information (including, but not limited to, the device identifier and name and a name of the device operation system) and standard web information, such as your browser type.
Source	From a visitor's browser when they visit our Websites, unless they have prohibited us from doing so.
Purpose	We want to make sure we can improve the user's experience on our Websites, have an insight into how the market responds to our public communication, analyze usage and activity in connection with our Website and services to improve the Website.
<p>If you don't want to share this information with us, let us know, for example, by changing your device and browser settings. Your browsing experience through our Website will <u>not</u> be effected in any way.</p>	
Legal ground	On the consent given by the settings of your Internet access device and browsing settings, which can be withdrawn at anytime.
Sub-processors	We use a marketing company "Make Marketing Magic" that uses in its turn Google Analytics for collecting data and Amazon hosting services in Germany to store this data. To protect Personal Data that is being processed outside the EU/EEA, Google Analytics and Amazon participate in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework.

SENSITIVE PERSONAL DATA

We ask that you do not send us, and you not share, any sensitive Personal Information (e.g., government-issued or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background or trade union membership).

HOW LONG DOES FUSIX KEEP PERSONAL DATA?

The exact amount of time varies from the applicable statutory provisions, including the rules and principles of GDPR. We only keep the personal data for as long as it is needed and then we delete it.

When we have your personal data because you are a contact person for one of our customers or business partners, we keep the data until we hear from your employer that our records should be corrected, for example if you left the company that you were representing before. Also, for personal data that we

process for marketing purposes, we send information to those who have indicated to be interested and do so until you say stop. Then we delete your personal data from our marketing database.

DOES FUSIX SHARE YOUR PERSONAL DATA WITH THIRD PARTIES?

We may share your information where we need to with:

- Our subcontractors, who process your personal data on our behalf. When using subcontractors, we take appropriate care to ensure that also our subcontractors operate in accordance with this Statement. Our main sub-contractors include:
 - Software developers who assist us with offering our Team!works (public and customer networking tools) and IP network automation.
 - Providers of various business tools for invoicing, accountancy, CRM and marketing.
- We may also share your information in response to a legal process or authority request in order to comply with an applicable law or court order or in connection with judicial proceedings or other legal process.
- We also disclose data to competent authorities (e.g. to the police or emergency services) when required by law and always in accordance with a strict predefined processes.

Our sub-processors process and store data both within the EU, and in third countries. If we transfer your personal data, we will take the appropriate steps in line with applicable laws and use all reasonable effort to ensure your rights to privacy and data protection.

HOW DOES FUSIX SAFEGUARD YOUR DATA?

Unfortunately, any transmission of information via the internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your information transmitted through the Websites or over email; any transmission is at your own risk.

Once we have received your information, we will take appropriate technical and organizational measures to safeguard your personal data against loss, theft and unauthorized use, access or modification. Our security work addresses your personal data and aims to balance risk exposure, business value, available technology, vulnerabilities, and threats in order to comply with applicable laws and regulations.

DISCLAIMER: We will, from time to time, host links to and from the websites of our business partners or third parties. If you follow a link to any of these websites, these websites will have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information to those websites.

HOW DO I EXERCISE MY RIGHTS UNDER GDPR AS A DATA SUBJECT?

Under GDPR you have various rights including the right to access your personal data that is collected or processed by Fusix.

You are, of course, welcome to ask what type of information we at Fusix store about you and how and why we store it. If you contact us, we need you to show us that you are the person relating to the personal data about which you inquire (the email address or telephone number), therefore, we must receive the following official documentation from you in order to verify your identity and start processing your inquiry.

To protect against fraud, all of this documentation must be authenticated (notarized) in your country of residence:

1. A high quality copy of your valid passport or national ID card.
2. An official high quality copy of a document relating to the personal data that you wish to enquire about (e.g. a contract confirming that you use a specific IP address or your employment within a company that is a customer or a supplier of ours).

You may find helpful to know:

Our customers to whom we provide Internet services are always companies rather than individuals, therefore if you use an IP address for which Fusix provides its Internet services and want to know, what personal data about you is stored by your Internet service provider, we suggest that you contact in the

first place the company that provides Internet access to your personal devices, such as computer, mobile phone and tablet. It will be in a good position to verify your identity and hence the eligibility of your inquiry. In many occasions, it can verify your request much faster than Fusix, because we work in the business to business market.

WHO AM I SUPPOSED TO CONTACT TO START THE PROCESS WITH FUSIX?

The address to contact us on is privacy@fusix.nl. Please remember that, in order to avoid giving personal data to wrong people, we can not process your request until we have the required proof of your identity and ownership of the data that you inquire about.

To start the process, we'll have to know which of the following rights you would like to invoke:

- Right to access (to know which information we store about you)
- Right to erasure (to erase personal data from our information storages)
- Right to object (to deny us the right to use your personal data that we collected)
- Right to revoke consent (to deny us the right to collect your personal data)

Notes:

if you want to revoke a previous consent you've given to us to send you marketing e-mails, the easiest way to do this is to opt out at the footer of any marketing email you receive.

If you want to revoke a previous consent you've given to us to collect information about your browsing of our Websites, the easiest way to do this is to change your browsing settings on your computer, tablet and mobile phone.

- Right to portability (to have your data transferred to another service provider of your choice)
- Right to rectification (to change or correct any inaccurate, out-dated, or faulty personal data we have of you)

You can find more information about your rights at: https://ec.europa.eu/info/law/law-topic/data-protection/reform/rights-citizens_en.

If you are not happy with how Fusix handles your personal data, we will do our best to help, but you also have the right to lodge a complaint to your local (EU) supervisory authority. You can find a list of EU data protection authorities at: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.

UPDATES

We may update this Statement from time to time. Any changes we will make will be posted on this page under a new document version number. Please check back frequently to see any updates or changes.

WHO CAN I CONTACT IF I HAVE MORE QUESTIONS?

If you have any questions about this Privacy Statement or your personal data, you can contact us using the following information: privacy@fusix.nl, +31 (0) 401 4441