



DATA PRIVACY NOTICE APPLICABLE TO THE EU, SWITZERLAND, AND THE UK

VERSION 1.09; EFFECTIVE 30 DECEMBER 2024

In this Data Privacy Notice (the "Privacy Notice"):

- OPEX Corporation, with offices located in New Jersey, United States of America ("OPEX Corporation"), describes how [opex.com](https://www.opex.com) and the other websites listed in Appendix A (each, "the Website" or "Website") operate and how OPEX Corporation collects, uses, and shares information, including personal data, gathered from visitors to the Website or in the course of business activities conducted by OPEX Corporation elsewhere, when OPEX Corporation acts as the controller of that data and when its processing is governed by the European Union's ("EU's") General Data Protection Regulation ("GDPR"), Swiss data protection law, or the data protection laws applicable in the United Kingdom (the "UK").
- The registered branch offices and subsidiaries of OPEX Corporation listed in Appendix B (an "OPEX Branch/Subsidiary") describe how each of them independently collects, uses, and shares information, including personal data, gathered in the course of conducting its business when the OPEX Branch/Subsidiary acts as a controller of that data and when the OPEX Branch/Subsidiary's processing is governed by the EU's GDPR, Swiss data protection law, or the data protection laws applicable in the UK.

This Privacy Notice may be updated periodically to reflect changes in OPEX Corporation's or OPEX Branches/Subsidiaries' information practices. The latest update will be indicated at the top of this Privacy Notice.

COLLECTING INFORMATION

OPEX Corporation and the OPEX Branches/Subsidiaries collect information that you provide to us as well as from third parties. Furthermore, OPEX Corporation collects information from you automatically when you use the Website.

Information You Provide To Us: OPEX Corporation and the OPEX Branches/Subsidiaries collect information that you provide to us when you solicit business from us, purchase products and services offered by us, perform supply or similar contracts with us, request information from us, contact us, register with us, complete a survey, submit an email. Furthermore, OPEX Corporation collects information from you when you use the Website or services available through the Website. The information referenced above may include your personal data including, by way of example, your name, postal address, telephone number, fax number, e-mail address, subscriber/screen name, and password used to access our services.

Data Collected from Third Parties: OPEX Corporation and the OPEX Branches/Subsidiaries may obtain data from third parties and, where permitted by law, append this data to other data that we already maintain about you. For additional information, see COOKIES AND OTHER TRACKING TECHNOLOGIES as well as ANALYTICAL TOOLS below.

Automatically Collected Data: OPEX Corporation and its third-party service providers collect data about you automatically when you visit the Website, namely through 'cookies,' 'web beacons,' and other



tracking technologies. When you access the Website, communications data (e.g., home service domain name and Internet protocol address) or utilization data (e.g., information on the beginning, end, and extent of each access, as well as information on the services that you accessed) may be generated. As permitted by applicable law, OPEX Corporation and its third-party service providers may combine this information with the personal data that OPEX Corporation collects about you. For additional information, see COOKIES AND OTHER TRACKING TECHNOLOGIES as well as ANALYTICAL TOOLS below.

INFORMATION THAT WE REQUIRE

Where the collection and processing of personal data are required by law or to perform a contract, OPEX Corporation or an OPEX Branch/Subsidiary, as applicable, will request it from you. Failure to provide such data may result in OPEX Corporation or the OPEX Branch/Subsidiary being unable to provide products or services you request or to perform a contract to which you are a party.

USING YOUR INFORMATION

The following is an overview of the purposes for which OPEX Corporation and the OPEX Branches/Subsidiaries, as applicable, use your information, including your personal data. Additional details on how OPEX Corporation and the OPEX Branches/Subsidiaries process your personal data may be provided to you in a separate notice(s) or contract(s).

All processing (i.e., use) of your personal data is justified by a "condition" (called a "legal basis") for processing. In addition, the processing of sensitive personal data (such as passwords) is always specifically justified. In the majority of cases, processing will be justified on the following legal bases:

- the processing is necessary for OPEX Corporation or the OPEX Branch/Subsidiary to perform a contract with you or take steps to enter into a contract at your request (such as when we fulfill orders or you request product information or provide your details to obtain after-sales service);
- the processing is necessary for OPEX Corporation or the OPEX Branch/Subsidiary to comply with an EU or Swiss legal obligation (such as contractor vetting, accounting, and tax recordkeeping, and responding to EU, Swiss, or United Kingdom law enforcement or court orders);
- with respect to OPEX Corporation, the processing is in OPEX Corporation's legitimate interests, and not overridden by your interests and fundamental rights, and notably OPEX Corporation's legitimate interests in using Website visitor, customer, and supplier data to conduct and develop OPEX Corporation's business activities with such visitors, customers, suppliers, and others. For example, OPEX Corporation may rely on our legitimate interests when processing personal data to understand your business needs, to improve our products and services (such as by soliciting your comments or tracking preferences on the Website), for marketing and promotional purposes, to investigate, prevent, or take action regarding illegal activities, and/or to respond to US or other non-EU or Swiss law enforcement or court orders;
- with respect to an OPEX Branch/Subsidiary, the processing is in the legitimate interest of the OPEX Branch/Subsidiary and not overridden by your interests and fundamental rights, and notably the OPEX Branch/Subsidiary's legitimate interests in using customer and supplier data to conduct and develop the OPEX Branch/Subsidiary's business activities with such customers, suppliers, and others. For example, the OPEX Branch/Subsidiary may rely on its legitimate interests when



processing personal data to understand your business needs, to improve its products and services, for marketing and promotional purposes, to investigate, prevent, or take action regarding illegal activities, and to respond to US or other non-EU or Swiss law enforcement or court orders; or

- you have consented to the processing (such as to send you direct marketing information).

OPEX Corporation and the OPEX Branches/Subsidiaries (or a third party operating on our behalf) may use your information, including your personal data, for the following purposes, as permitted by law:

- To provide OPEX products and services to you, to communicate with you about your use of such OPEX products and services, provide you with OPEX product updates/releases and news, respond to your inquiries, fill your orders, and/or for other customer service-related purposes.
- To help OPEX Corporation and the OPEX Branches/Subsidiaries better understand your business needs; to support a potential or current customer relationship with you, and to better understand how OPEX Corporation and the OPEX Branches/Subsidiaries can improve OPEX products and services, such as by soliciting your comments or, in the case of OPEX Corporation, tracking your preferences when browsing the Website.
- To contact you about OPEX products and services and to conduct surveys to better understand your needs as a potential or current customer.
- For marketing and promotional purposes, including through email or equivalent electronic means. For example, OPEX Corporation and the OPEX Branches/Subsidiaries may use personal data such as an email address to send news and newsletters, special offers and promotions, and to otherwise contact customers about OPEX products, services, or information that we think may interest customers. OPEX Corporation and the OPEX Branches/Subsidiaries may also use personal data to assist them in advertising OPEX products and services on third-party websites where proper consent has been obtained.
- For research and development purposes, including to improve OPEX products and services.
- In the case of OPEX Corporation, to improve the Website by tracking your activities on the Website; to understand the demographics of visitors to the Website by tracking your activities on the Website, and for other research and analytical purposes.
- To comply with applicable legal obligations, including to respond to a subpoena or court order.
- To protect the rights and interests of OPEX Corporation and the OPEX Branches/Subsidiaries as well as the rights and interests of other customers, suppliers, visitors to the Website, or other third parties, where we believe it is necessary to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notice, or violations of OPEX Corporation's [WEBSITE TERMS OF USE](#) ("Terms of Use").

SHARING INFORMATION

OPEX Corporation and the OPEX Branches/Subsidiaries may share your information, including your personal data, for any of the reasons described in USING YOUR INFORMATION above as follows:



- **OPEX Group of Companies.** We may share the information that we collect from you within the OPEX group of companies, including to and among OPEX group companies located outside of your home country.
- **Service Providers.** We may share the information that we collect from you with third-party vendors, service providers, contractors, and agents who perform functions on our behalf. For example, we may use third parties to conduct surveys on our behalf, to perform information technology and other technical support functions, and for other purposes consistent with the purposes for which you have provided information to us.

We may also share your information in the following circumstances:

- **Business Transfers.** If OPEX Corporation or an OPEX Branch/Subsidiary is acquired by or merged with another company, if all or substantially all of the assets of OPEX Corporation or an OPEX Branch/Subsidiary are transferred to another company, or as part of preparation for such a transaction or as part of a bankruptcy proceeding, OPEX Corporation or the OPEX Branch/Subsidiary, as applicable, may transfer in whole or in part the information we have collected from you to such other company.
- **In Response to Legal Process.** We may also share the information that we collect from you to comply with the law, a judicial proceeding, court order, or another legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We may share the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Privacy Notice or the Terms of Use, or as evidence in litigation in which we, our affiliates, or subsidiaries are involved.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information with third parties for marketing, advertising, research, or similar purposes, including to assist us in determining relevant advertising platforms as well as to determine the success of our various campaigns.

COOKIES AND OTHER TRACKING TECHNOLOGIES

When you view the Website, OPEX Corporation and its service providers may store some data on your device in the form of a 'cookie,' 'web beacon,' or other tracking technologies (collectively, "cookies") to automatically recognize your device when you visit the Website. Cookies help OPEX Corporation in many ways. For example, cookies can allow OPEX Corporation to tailor your Website visit to better match your interests, as indicated by your activities when browsing the Website or other sites. Furthermore, cookies, for example, also help OPEX Corporation and its service providers to understand what advertisements you have been shown or clicked on as well as to present you with advertisements that are more relevant to you.

PLEASE SEE MORE DETAILED INFORMATION ABOUT THESE COOKIES, INCLUDING INFORMATION ABOUT HOW TO BLOCK OR MANAGE THE COOKIES, IN OPEX Corporation's [COOKIES NOTICE APPLICABLE TO THE EU, SWITZERLAND, AND THE UK](#).

ANALYTICAL TOOLS

OPEX Corporation may use with the Website the analytical tools listed below. (To the extent such analytical tools make use of cookies, the information below should be read in conjunction with OPEX Corporation's [COOKIES NOTICE APPLICABLE TO THE EU, SWITZERLAND, AND THE UK](#)).

- **CallRail:** The Website may use services provided by CallRail, Inc., 100 Peachtree St. NW, Suite 2700, Atlanta, Georgia 30303 USA ("CallRail"). The CallRail services use cookies to allow OPEX Corporation to track calls, texts, forms, and chats for marketing purposes, such as to gauge the effectiveness of our advertising campaigns and to personalize content. For further details, see CallRail's Privacy Policy at <https://www.callrail.com/privacy>
- **Eloqua:** The Website may use Eloqua analytical services provided by Oracle Corporation, 10 Van de Graaff Drive, Burlington, Massachusetts 01803 USA ("Oracle"). Eloqua uses cookies to collect information about how you use the Website (in an anonymous form other than as described below). OPEX Corporation uses that information to compile reports and to help us to improve the Website. The cookies collect information including the site from where visitors have come to the Website and the pages they visited.

These cookies also enable the delivery of Oracle Eloqua marketing. If you are a subscriber of marketing-related emails from OPEX Corporation, these cookies track your interactions with Oracle Eloqua marketing and generate information on your visits to the Website in a non-anonymous form. For further details, see Oracle's Privacy Policy at <https://www.oracle.com/legal/privacy/privacy-policy.html>.

- **Google Analytics:** To help OPEX Corporation design and optimize the Website, the Website may use Google Analytics, an analytical service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043 USA ("Google"). In this context, pseudonymized user profiles are created and cookies are used. The information generated by the cookie about your use of the Website is transferred to Google. This information is used to evaluate your use of the Website, to compile reports on Website activities, and to provide further services associated with the use of the Website and the Internet, for the purpose of market research and the demand-oriented design of the Website. IP addresses are anonymized so that assignment is not possible (IP masking). Further information on data protection in connection with Google Analytics can be found in Google Analytics' Help section at <https://support.google.com/analytics/answer/6004245?hl=en>. You can prevent the collection of data generated by the cookie and related to your use of the Website (including your IP address) and the processing of this data by Google, for example, by downloading and installing a browser add-on at <https://tools.google.com/dlpage/gaoptout?hl=en>.
- **Google AdWords Conversion Tracking:** The Website may use Google's Adwords conversion tracking ("Google Adwords") to generate statistics related to the use of the Website and for the purpose of optimizing our Website. Google Adwords is provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043 USA ("Google"). Google Adwords places a cookie on your device if you have accessed the Website via a Google ad. If you then visit certain pages of the Website and the cookie has not yet expired, OPEX Corporation and Google can recognize that you have clicked on the ad and have been redirected to those pages.

Each Adwords customer such as OPEX Corporation receives a different cookie. The information collected using the conversion cookie is used to generate conversion statistics for Adwords customers who have opted for conversion tracking. Adwords customers see the total number of users who clicked on their ad and were redirected to a page with a conversion tracking tag. However, they do not receive any information that personally identifies users. Google's Privacy Policy on conversion tracking can be found at <https://policies.google.com/privacy?hl=en>. If you do not wish to participate in the tracking process, you can refuse to accept the cookie required for this by, for example, using a browser setting that generally deactivates the automatic acceptance of cookies.

- **Google reCAPTCHA:** The Website may use Google reCAPTCHA provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, California 94043 USA ("Google"). Google reCAPTCHA checks whether the entry of data (e.g., into a contact form on the Website) is done by a human or an automated program. To do this, reCAPTCHA analyzes the behavior of the Website visitor on the basis of different characteristics. This analysis starts automatically as soon as the Website visitor accesses the Website. For analysis, reCAPTCHA evaluates different information (e.g., IP address, the amount of time the Website visitor stays on the Website, etc.). The data collected during the analysis is transmitted to Google. reCAPTCHA analyses run completely in the background, and visitors to the Website are not informed that an analysis is taking place. Further information about Google reCAPTCHA and Google's Privacy Policy can be found at <https://policies.google.com/privacy?hl=en> and <https://www.google.com/recaptcha/intro/android.html>.
- **Hotjar:** The Website may use the Hotjar analytical services provided by Hotjar Ltd., 3 Lyons Range, 20 Bisazza Street, Sliema SLM 1640, Malta to help OPEX Corporation better understand visitors' experiences of the Website (e.g., how much time a visitor spends on a page, which links the visitor chooses to click, what the visitor does and does not like, etc.). This, in turn, helps OPEX Corporation to design and optimize the Website.

The Hotjar analytical services use cookies and other technologies to collect data on visitors' behavior and their devices, in particular, the IP address of the device (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and preferred language used to display the Website. Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor OPEX Corporation will use this information to identify individual users. For further details, please see Hotjar's Privacy Policy at <https://www.hotjar.com/legal/policies/privacy>. You can opt out of the creation of a Hotjar user profile, Hotjar's storing of data about your usage of our site, and Hotjar's use of tracking cookies on other websites by visiting <https://www.hotjar.com/legal/compliance/opt-out>.

- **LinkedIn:** The Website may use LinkedIn conversion tracking technology and retargeting features provided by LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, California 94085 USA ("LinkedIn"). LinkedIn technology allows visitors to the Website to play personalized ads on LinkedIn. It also provides OPEX Corporation the ability to create anonymous reports on ad performance and website interaction information. To do this, the LinkedIn Insight tag is included on the Website, which connects the visitor to the LinkedIn server when the visitor visits the

Website and is logged into LinkedIn at the same time. For further details, see LinkedIn's Privacy Policy at <https://www.linkedin.com/legal/privacy-policy>. If you are logged in to LinkedIn, you can deactivate data collection at any time by clicking on the following link: <https://www.linkedin.com/settings/enhanced-advertising>.

- **Sirv:** The Website may use image content delivery network (CDN) tools provided by Sirv Limited, 9 Cowley Road, Oxford, Oxfordshire, OX4 1HP, United Kingdom ("Sirv"). Sirv's CDN tools enable image processing, image resizing, image optimization, responsive images, a 360° product viewer, and image zoom.

Sirv does not currently process personal data. The IP addresses of visitors to the Website who request files from Sirv are logged temporarily as part of HTTP server logs, but Sirv holds no personally identifiable information to match those IP addresses, and the IP addresses are not shared with anyone, including Sirv account holder such as OPEX Corporation. The HTTP logs are used only to provide aggregated analytics within OPEX Corporation's Sirv account. Moreover, Sirv does not place cookies on visitors' browsers. For additional information, see <https://sirv.com/data>.

- **Vimeo:** The Website may embed videos from OPEX Corporation's official Vimeo channel(s). If a visitor to the Website presses 'play' on such a Vimeo video, Vimeo.com, Inc., 330 West 34th Street, 10th Floor New York, New York 10001 USA and/or its corporate affiliates ("Vimeo"), may set cookies to enable the video to play and maintain the security of Vimeo's services. These cookies do not directly identify anyone.

If a visitor to the Website has a Vimeo account and is logged into that account, Vimeo may set cookies for analytics and advertising purposes and collect data linked to the visitor's Vimeo account when the visitor visits a Website page containing a Vimeo video. For more information, see Vimeo's cookies policy at https://vimeo.com/cookie_policy.

- **YouTube:** The Website may embed videos from OPEX Corporation's official YouTube channel(s) using 'privacy-enhanced mode' provided by YouTube LLC, 901 Cherry Ave., San Bruno, California 94066 USA and/or its corporate affiliates ("YouTube"). 'Privacy-enhanced mode' may set cookies on the visitor's computer when the visitor arrives on a Website page that contains a YouTube video. These cookies do not directly identify individual users, and YouTube does not store information to personalize the visitor's experience unless the visitor is logged into a Google account. For further information, see YouTube's embedded videos page at <http://www.google.com/support/youtube/bin/answer.py?hl=en-GB&answer=171780>

If a visitor to the Website has a Google account and is logged into that account, YouTube may set cookies for analytics and advertising purposes and collect data linked to the visitor's Google account. For more information, see Google's Privacy Policy at <https://policies.google.com/privacy?gl=GB&hl=en-GB#intro>.

SOCIAL PLUG-INS

OPEX Corporation may use with the Website the social plug-ins below ("Plug-ins") to enable you to share Website content with others. (To the extent such Plug-ins make use of cookies, the information below



should be read in conjunction with OPEX Corporation's [COOKIES NOTICE APPLICABLE TO THE EU, SWITZERLAND, AND THE UK.](#))

- **Facebook Plug-ins:** The Facebook Plug-ins are operated (by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025 USA ("Facebook"). You can find information on data protection on Facebook by visiting <https://www.facebook.com/policy.php>.
- **LinkedIn Plug-ins:** The LinkedIn Plug-ins are operated by LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, California 94085 USA ("LinkedIn"). You can find information on data protection at LinkedIn by visiting <https://www.linkedin.com/legal/privacy-policy>.
- **X Plug-ins:** The X (Twitter) Plug-ins are operated by Twitter International Unlimited Company, c/o Wasag Treuhand AG, Bolligenstrasse 18, 3006 Bern, Switzerland ("Twitter" or "X"). You can find information on data protection at X (Twitter) by visiting <https://www.twitter.com/privacy>.

Each of the providers of the Plug-ins above is referred to hereinafter as a "Plug-in Provider".

To increase the protection of your data when visiting the Website, plug-ins are embedded using the so-called "Shariff Solution." This means that when a page of the Website is accessed, a connection to the servers of the respective Plug-in Provider is not yet established.

Your web browser establishes a direct connection to the respective Plug-in Provider's servers only when you activate the Plug-ins. When you activate a Plug-in, the Plug-in Provider receives information that your web browser has accessed the respective site of our Website, even when you do not maintain a user account with the provider or are not logged in. Usage data (including the IP address) are transmitted directly from your web browser to a server of the respective Plug-in Provider and may be stored there. This server may be located outside the EU or EEA (e.g., in the U.S.).

If you do not wish the Plug-in Providers to receive, save, or use data gathered through the Website, you should not use the respective Plug-ins. You can also block the Plug-ins from being loaded with browser add-ons (so-called 'script blockers').

Find out more about the purpose and scope of the data collection as well as about the processing and use of your data by Plug-in Providers and about your rights and possibilities to change settings to protect your data in the privacy statements of the respective providers linked above.

CHILDREN

The Website is not for use by children under the age of 16 years, and OPEX Corporation does not knowingly collect, store, share, or use the personal data of children under 16 years. If you are under the age of 16 years, please do not provide any personal data, even if prompted by the Website to do so. If you are under the age of 16 years and you have provided personal data, please ask your parent(s) or guardian(s) to notify OPEX Corporation at info@opex.com, and OPEX Corporation will delete the personal data.



TRANSFERS OF YOUR INFORMATION

The Website is controlled, operated, and administered by OPEX Corporation from its offices within the United States of America.

Your information, including personal data, may be processed in the United States of America and any other country in which OPEX Corporation, the OPEX Branches/Subsidiaries, and/or their third-party suppliers have operations including without limitation France, Germany, India (for database administration and related IT support), the Republic of Ireland, Switzerland, and the UK. OPEX Corporation and the OPEX Branches/Subsidiaries will take steps to ensure that your personal data receives the same level of protection as if it remained within the European Union, Switzerland, or the UK, including by entering into data transfer agreements, using the European Commission-approved Standard Contractual Clauses, relevant national equivalents, or other permitted safeguards.

For transfers to OPEX Corporation in the United States and transfers within the OPEX Branches/Subsidiaries, we have put in place European Commission-approved Standard Contractual Clauses, relevant national equivalents, or other permitted safeguards. If applicable, you have a right to obtain details of the mechanism under which your personal data is transferred outside of the EU, Switzerland, or the UK by contacting us at info@opex.com.

RETENTION OF YOUR INFORMATION

OPEX Corporation and the OPEX Branches/Subsidiaries apply a general rule of keeping personal data only for as long as required to fulfill the purposes for which it was collected, which in most cases corresponds to the applicable statute of limitations. Personal data used for marketing will be retained no longer than is permitted pursuant to applicable law. However, in some circumstances, OPEX Corporation and the OPEX Branches/Subsidiaries may retain personal data for other periods of time, for instance where we are required to do so in accordance with legal, tax, or accounting requirements, or if required to do so by a legal process, legal authority, or other governmental entity having authority to make the request, for so long as required.

YOUR RIGHTS REGARDING YOUR INFORMATION

OPEX Corporation and the OPEX Branches/Subsidiaries will take steps in accordance with applicable law to keep your personal data accurate, complete, and up-to-date. You are entitled to have inadequate, incomplete, or incorrect personal data corrected (that is, rectified).

You also have the right to request access to your personal data as well as to obtain additional information about the processing.

In the event your personal data is processed on the basis of your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

Further, you are entitled to object to the processing of your personal data and have your personal data erased, under certain circumstances.

Your rights also include:

- *Data portability* – where we are relying (as the legal basis for processing) upon your consent, or the fact that the processing is necessary to perform a contract to which you are party or to take steps at your request prior to entering a contract, and the personal data is processed by automated means, you have the right to receive all such personal data which you have provided us in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- *Right to erasure* – you are entitled to have your personal data erased under specific circumstances, such as where you have withdrawn your consent, where you object to processing based on legitimate interests, and we have no overriding legitimate grounds (see below) or where personal data is unlawfully processed.
- *Right to the restriction of processing* – you have the right to restrict our processing of your personal data (that is, allow only its storage) where:
 - you contest the accuracy of the personal data until we have taken sufficient steps to correct or verify its accuracy;
 - where the processing is unlawful but you do not want us to erase the personal data;
 - where we no longer need your personal data for the processing, but you require such personal data for the establishment, exercise, or defense of legal claims; or
 - where you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether we have compelling legitimate grounds to continue processing.

Where your personal data is subject to restriction, we will only process it with your consent or for the establishment, exercise, or defense of legal claims.

- ***Right to object to processing based on legitimate interest legal basis*** – where we are relying upon legitimate interests to process personal data, you have the right to object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or we need to process the personal data for the establishment, exercise, or defense of legal claims. Where we rely upon legitimate interest as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.
- ***Right to object to direct marketing (including profiling)*** – you have the right to object to our use of your personal data (including profiling) for direct marketing purposes, such as when we use your personal data to invite you to our promotional events.
- You also have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of alleged infringement, if you consider that the processing of your personal data infringes applicable law.



Please contact us as indicated in EXERCISING YOUR RIGHTS; QUESTIONS AND COMMENTS below if you wish to exercise any of your rights, or if you have any inquiries or comments regarding the processing of your personal data.

SECURITY

To help protect your personal data against accidental or unlawful destruction, loss or alteration, and against unauthorized disclosure or access, OPEX uses reasonable technical and organizational security measures. However, please note that no data transmission over the Internet, especially the use of email, can be guaranteed to be absolutely secure. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

LINKS TO OTHER WEBSITES

Please be aware that the Website may contain links to other, third-party websites that operate independently from OPEX Corporation in whole or in part and to which this Privacy Notice does not apply. Such third-party websites may also reference or link to an OPEX Corporation website.

OPEX Corporation shall not be responsible for the privacy practices or the content of such third-party websites and disclaims any responsibility for such privacy practices and content. Without limiting the foregoing, any transactions that you enter into with any vendor, merchant, or another party that you access through such third-party websites are solely between you and that vendor, merchant, or another party.

This Privacy Notice shall not apply to any such third-party sites. For applicable provisions governing privacy on third-party sites, please refer to the privacy disclosures (if any) of the third-party site.

NOTICE TO POTENTIAL JOB APPLICANTS

If you are located in the European Union, Switzerland, or the United Kingdom and applying through the Website for a position located in any of those areas, please refer to Appendix C for the privacy notice applicable to your personal data.

EXERCISING YOUR RIGHTS; QUESTIONS AND COMMENTS

To exercise any of your rights, please contact us at info@opex.com or at the applicable postal address or telephone number below.

If you wish to update or remove your personal data, opt out from receiving, or opt in to receive, marketing communications from us, please do so by indicating your preference on the Website (where available) or by contacting us at the postal address or email address below.

If you have any questions or comments about this Privacy Notice (e.g., to review and update your personal data), please contact us at info@opex.com.

Alternatively, you may contact OPEX Corporation in the United States using the address and telephone number below, or you may contact the applicable OPEX Branch/Subsidiary using the relevant address(es) in Appendix B.



OPEX
305 Commerce Drive
Moorestown, New Jersey 08057-4234 USA
Attn.: John Sullivan, International Counsel
Telephone number: +1 856.727.1100

If you are located in Germany, you may also contact our Data Protection Officer for Germany using the contact details below.

OPEX
305 Commerce Drive
Moorestown, New Jersey 08057-4234 USA
Attn.: John Sullivan, International Counsel & Data Protection Officer (Germany)
Email: jsullivan@opex.com
Telephone number: +1 856.727.1100

CHANGES TO THIS NOTICE

Any changes or updates we may make to this Privacy Notice will be posted to the Website's privacy policy page in advance. Please check back frequently to see any updates or changes to this Privacy Notice.

**APPENDIX A
COVERED WEBSITES/URLs**

opex.com
digitizeyourdocuments.com
digitiseyourdocuments.com.au
warehouseautomation.com.br
digitiseyourdocuments.co.uk
digitizeyourdocuments.de
digitizeyourdocuments.fr
warehouseautomation.com
warehouseautomation.de
warehouseautomation.fr
warehouseautomation.jp
warehouseautomation.kr
warehouseautomation.mx

APPENDIX B
OPEX BRANCH OFFICES/SUBSIDIARIES

Applicable Country:	Name and Address of the Branch Office/Subsidiary:
France	OPEX Business Machines GmbH, France branch <i>Address:</i> Director EMEA, OPEX, Les Fjords – Bâtiment Vega, 19, avenue de Norvège, ZA de Courtaboeuf, 91140 Villebon-sur-Yvette, FRANCE
Germany	OPEX Business Machines GmbH (Schweiz), Germany branch <i>Address:</i> Director EMEA, OPEX, Auf der Lug 8, 71726 Benningen am Neckar, GERMANY
Republic of Ireland	OPEX Business Machines GmbH, Republic of Ireland branch <i>Address:</i> Director EMEA, OPEX, c/o 104 Lower Baggot Street, Dublin 2, REPUBLIC OF IRELAND
Switzerland	OPEX Business Machines GmbH <i>Address:</i> Director EMEA, OPEX, c/o Obergrundstrasse 61, 6003 Luzern, SWITZERLAND
United Kingdom	OPEX Business Machines GmbH, United Kingdom branch <i>Address:</i> Director EMEA, OPEX, 29/32 Queensbrook, Bolton Technology Exchange, Spa Road, Bolton BL1 4AY, UNITED KINGDOM
United States	OPEX Business Machines International Inc. <i>Address:</i> Vice President, Corp. & Legal Affairs, OPEX, 251 Little Falls Drive, Wilmington, Delaware 19808, USA



APPENDIX C
JOB CANDIDATE PRIVACY NOTICE
APPLICABLE TO CANDIDATES APPLYING FOR OPEX JOBS LOCATED IN THE EUROPEAN UNION,
SWITZERLAND, AND THE UK

The applicable registered branch office of OPEX Business Machines GmbH in Schedule 1 ("**OPEX**," the "**Company**," "**we**," or "**us**") takes your data protection rights and our legal obligations seriously. The information that you provide to OPEX in the course of your application for employment with us as well as other information that directly or indirectly identifies you ("**Personal Data**") will be treated in a secure and confidential manner as set out in this Privacy Notice ("**Notice**").

The Company is the data controller of your Personal Data.

Personal Data

We may collect various types of Personal Data about you for the purposes described in this Notice, including:

- *Data about you:* forename, middle name, surname, gender, nationality, civil/marital status, date of birth, age, home contact details (e.g., address, telephone number, e-mail), national ID number, immigration status and eligibility to work data, next-of-kin/dependent contact information, driver's license status and license number, desired position, desired schedule.
- *Data about your employment history and qualifications:* qualifications, references, resumé/CV, application, current employment status, previous work history with OPEX (if any).
- *Data about your application:* CV and application, interview data, verification, expected start date.

Personal Data We Process

You may give us the Personal Data described above during the recruitment process, whether through your application, further communications, on the telephone, or at interviews.

We may also receive Personal Data about you from third parties, for example: recruiters; previous employers in the form of references; business partners; sub-contractors providing recruiting or technical services; analytics providers; search information providers; as well as from publicly available sources such as social media where such Personal Data is proportionate to the position for which you are applying. We may also retain that Personal Data after you have been employed (where this is relevant and to the extent permitted by applicable law).

We may also receive information which may include your Personal Data from our hiring manager(s), from Human Resources, from recruiters, and from time to time, from our other employees (for instance, in the course of conducting an interview).

Why We Process Your Personal Data

The Personal Data requested from you during the recruitment process is required by us in order to assess your application for employment with the Company. If you do not provide some or all of this Personal Data it may affect our ability to process your application and therefore to enter into an employment agreement with you. In some cases, it may mean that we are unable to continue with your application



for employment as the Company will not have the Personal Data we believe to be necessary for the effective and efficient management of the recruitment process.

We collect the Personal Data described in Sections 1 and 2 above for the purposes of managing the Company's recruitment-related activities. The Company may also use your Personal Data in relation to the evaluation and selection of applicants, including for example setting up and conducting interviews and tests, conducting evaluations and assessments, and otherwise as needed in the recruitment process, including if relevant, issuing employment offers.

We process your Personal Data for the purposes described above on at least one of the following legal bases:

- the processing is necessary for compliance with a legal obligation to which the Company is subject (notably verifying eligibility for employment or complying with obligations regarding non-discrimination); or
- the processing is necessary in order to take steps at your request prior to entering into an employment contract with you (notably verifying your qualifications and work history); or
- the processing is necessary for the legitimate interests pursued by the Company in hiring qualified and appropriate persons (notably by conducting interviews), except if in light of particular circumstances, our interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

With Whom Do We Share Your Personal Data?

Your Personal Data may be shared with affiliated companies where it is reasonable and necessary to do so. For example, within the OPEX group of companies, your Personal Data can be accessed by or may be disclosed internally on a need-to-know basis to persons responsible for managing or making hiring decisions, Human Resources staff, system administrators, and other support teams (such as Finance, Legal, and Information Technology or "IT").

Your Personal Data may also be accessed by third parties who provide us or our affiliated companies with services relevant to your recruitment, namely recruiters; companies that host, support and maintain the IT systems supporting our recruitment system, if any; and companies that verify your references or conduct vetting on our behalf.

If your application for employment with the Company is successful and you accept a job offer from us, your Personal Data may also be shared with human resources information, payroll, and benefits systems, and the Personal Data contained in such systems may be accessible by providers of those systems, their affiliated companies, and their sub-contractors; tax authorities; regulatory authorities; and our and our affiliated companies' lawyers, auditors, investors, consultants, and other professional advisors.

The Company expects all third parties to process any Personal Data disclosed to them in accordance with applicable law and contract terms, including with respect to Personal Data confidentiality and security. Where these third parties act as a "data processor" (for example, by verifying your references at our request), they carry out their tasks on our behalf and upon our instructions for the purposes mentioned above. In this case, your Personal Data will only be disclosed to these parties to the extent necessary to provide the required services.

The Company will not disclose your Personal Data to unauthorized third parties.



Security of Personal Data

We implement what we determine to be reasonable physical, technical, and administrative security standards designed to protect your Personal Data from loss, misuse, alteration, destruction, or damage.

Where we Process and Store your Personal Data

From time to time, your Personal Data will be transferred outside of the home country of the applicable OPEX registered branch office listed in Schedule 1 for the purposes described in this Notice. For example, your Personal Data may be transferred, among other purposes, to conduct the review of your application, the processing of your details, and the provision of support services.

We may share your Personal Data (i) with colleagues at OPEX Business Machines GmbH in France, Germany, the Republic of Ireland, Switzerland, and the United Kingdom; (ii) with colleagues at OPEX Corporation in Canada and the United States, (iii) with colleagues at OPEX Business Machines International Inc. in the United States; and (iv) with third parties as described in this Notice. A list of the countries located outside the European Union (the "EU"), Switzerland, and the United Kingdom to which your Personal Data may be transferred can be found in Schedule 1A.

Transfers to OPEX Business Machines International Inc. in the United States and OPEX Corporation in the United States will be made pursuant to the European Commission-approved Standard Contractual Clauses, the relevant national equivalents thereof, or other permitted safeguards. Other transfers outside the EU, Switzerland, or the United Kingdom may be made pursuant to the European Commission-approved Standard Contractual Clauses or other legally acceptable mechanisms that ensure an adequate level of protection. Where applicable, you are entitled, upon request sent to the OPEX representative set forth in Section 9, to receive a copy of the relevant contract (such as Standard Contractual Clauses) showing that appropriate safeguards have been taken to protect your Personal Data in connection with such transfer.

Retention of your Personal Data

Our general approach is to retain candidate Personal Data for a period not to exceed the maximum permitted by applicable law following the closure of the recruitment process relating to the role(s) for which you applied. In certain cases, legal or regulatory obligations require us to retain specific records for a set period of time.

If you accept employment with OPEX, your Personal Data will be held on the basis set out in our Employee Privacy Notice, which is provided to all employees.

Your Rights

Right to Access, Correct and Delete your Personal Data

The Company aims to ensure that all Personal Data is correct.

You have the right to request access to any of your Personal Data that the Company may hold, and to request correction of any inaccurate Personal Data relating to you. You furthermore have the right under certain circumstances to request deletion or object to the processing of Personal Data we hold about you.

If we are processing your Personal Data on the basis of your consent (for example, if we keep your details on file for future job openings), you have the right to withdraw such consent at any time. You can do this by contacting OPEX Corporation's Director EMEA or Administration Manager-Europe.

Additional rights

You also have the following additional rights:

- *Data portability* - where we are relying (as the legal basis for processing) upon your consent, or the fact that the processing is necessary to perform a contract to which you are party or to take steps at your request prior to entering a contract, and the Personal Data is processed by automatic means, you have the right to receive all such Personal Data which you have provided to the Company in a structured, commonly used and machine-readable format, and also to require us to transmit it to another controller where this is technically feasible.
- *Right to erasure* - you are entitled to have your Personal Data erased under specific circumstances, such as where you have withdrawn your consent, where you object to processing based on legitimate interests, and we have no overriding legitimate grounds (see below) or where Personal Data is unlawfully processed.
- *Right to the restriction of processing* - you have the right to restrict our processing of your Personal Data (that is, allow only its storage) where:
 - you contest the accuracy of the Personal Data, until we have taken sufficient steps to correct or verify its accuracy;
 - where the processing is unlawful but you do not want us to erase the Personal Data;
 - where we no longer need your Personal Data for the purposes of the processing, but you require such Personal Data for the establishment, exercise or defense of legal claims; or
 - where you have objected to processing justified on legitimate interest grounds (see below), pending verification as to whether the Company has compelling legitimate grounds to continue processing.

Where your Personal Data is subject to restriction, we will only process it with your consent or for the establishment, exercise, or defense of legal claims.

- ***Right to object to processing justified on legitimate interest grounds*** - where we are relying upon legitimate interest to process Personal Data, you have the right to object to that processing. If you object, we must stop that processing unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or we need to process the Personal Data for the establishment, exercise, or defense of legal claims. Where we rely upon legitimate interest as a basis for processing, we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.
- You also have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of alleged infringement, if you consider that the processing of your Personal Data infringes applicable law.

How to Contact Us; How to Exercise Your Rights



To obtain further information regarding your rights, to exercise any of your rights, or to ask any questions regarding the processing of your Personal Data, please contact the Company as follows:

- Please contact: OPEX, at the applicable address set forth in Schedule 1 (attention John Sullivan, jsullivan@opex.com)

If you are located in Germany, you may also contact the Company's Data Protection Officer for Germany as follows:

- John Sullivan, International Counsel & Data Protection Officer (Germany), OPEX, 305 Commerce Drive, Moorestown, New Jersey 08057-4234 USA (jsullivan@opex.com)

Changes to this Notice

If we still have your email on file, as described above, we will notify you in advance of any changes to this Notice that are material or may impact you.

SCHEDULE 1
LIST OF APPLICABLE REGISTERED BRANCHES

Applicable OPEX Business Machines GmbH Registered Branch:	For Jobs Based In:
<p>OPEX Business Machines GmbH, France branch</p> <p><i>Address:</i> Director EMEA, OPEX, Les Fjords – Bâtiment Vega, 19, avenue de Norvège, ZA de Courtaboeuf, 91140 Villebon-sur-Yvette, FRANCE</p>	France
<p>OPEX Business Machines GmbH (Schweiz), Germany branch</p> <p><i>Address:</i> Director EMEA, OPEX, Auf der Lug 8, 71726 Benningen am Neckar, GERMANY</p>	Germany
<p>OPEX Business Machines GmbH, Republic of Ireland branch</p> <p><i>Address:</i> Director EMEA, OPEX, c/o 104 Lower Baggot Street, Dublin 2, REPUBLIC OF IRELAND</p>	Republic of Ireland
<p>OPEX Business Machines GmbH, Swiss operations</p> <p><i>Address:</i> Director EMEA, OPEX, c/o Obergrundstrasse 61, 6003 Luzern, SWITZERLAND</p>	Switzerland
<p>OPEX Business Machines GmbH, United Kingdom branch</p> <p><i>Address:</i> Director EMEA, OPEX, 29/32 Queensbrook, Bolton Technology Exchange, Spa Road, Bolton BL1 4AY, UNITED KINGDOM</p>	United Kingdom

SCHEDULE 1A
LIST OF COUNTRIES OUTSIDE THE EU, SWITZERLAND, AND THE UNITED KINGDOM TO WHICH YOUR
JOB CANDIDATE PERSONAL DATA MAY BE TRANSFERRED

Countries*
India (for certain database administration and related IT support)
Israel ('Adequacy' pursuant to the EU Commission Decision of 31 January 2011, adopted by the UK) (for certain third-party IT post-incident analysis)
Japan ('Adequacy' pursuant to the EU Commission Decision of 23 January 2019, adopted by the UK) (for certain Asia-Pacific-related traffic subject to enterprise endpoint security)
US (for cloud storage, other cloud-based services, financial management, human resources management, IT management, etc.)

*For the most up-to-date list of countries, please contact the applicable OPEX contact person listed in the main body of this Job Candidate Privacy Notice.