

Your privacy is important to Leaseweb USA, Inc. (hereinafter "Leaseweb USA"). This Privacy Statement to inform you of Leaseweb USA's practices (as IaaS cloud provider) with respect to the possible collection and use of your personal information while doing business with you ("Personal Data"). This Leaseweb USA Privacy Statement applies to business customers who purchase or use business products or services provided by Leaseweb USA. If you reside in California the collection, use and sharing of your personal information is governed by the Leaseweb USA, Inc. California Privacy Statement.

Leaseweb USA is subject to the Regulation 2016/679/EU of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR"). Leaseweb USA has implemented the following requirements under the GDPR, including but not limited to:

- A record of our Personal Data processing activities.
- Adequate organizational and technical protection measures.
- Request forms and internal instructions for Privacy by Design & Default, Data Portability, Data Subject Rights like the Right to be Forgotten.
- A Data Processor Agreement in our role as data controller and data processor.
- A Personal Data Breach procedure.
- An internal privacy policy.
- In case of data export from the EU to the USA, Leaseweb USA supplies and lives up to the Standard Contractual Clauses to the extent deemed permitted and sustainable.
- A commitment to comply with EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") and the UK Extension to the EU-US DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. PDF), hereafter collectively "Privacy Frameworks" as re-certified annually.

AGREEMENT TO THIS PRIVACY STATEMENT

Please read this statement carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to not use our services. By accessing or using our services, you agree to this Privacy Statement. This Privacy Statement may change from time to time. Your continued use of our services after we make changes is deemed to be acceptance of those changes, so please check the statement periodically for updates.

HOW LEASEWEB USA MAY COLLECT INFORMATION ABOUT YOU

Leaseweb USA may collect your Personal Data when:

- You order a service from Leaseweb USA.
- You enter a promotion run by Leaseweb USA.
- You participate in a Leaseweb USA survey.
- You subscribe to a Leaseweb USA newsletter.
- You ask Leaseweb USA for more information about a Leaseweb service, or contact Leaseweb USA with a question, comment or complaint.
- You submit an abuse notification to Leaseweb USA.
- You use the Leaseweb USA network, Leaseweb USA infrastructure and/or other Leaseweb USA services.

WHAT KIND OF INFORMATION LEASEWEB USA MAY COLLECT ABOUT YOU

Leaseweb USA may collect the following information about you:

- Your name, address, phone number, email address business and ID registrations that may include photo and personal identification numbers and such contact details of legally authorized representatives.
- Your Leaseweb USA account information – such as the Leaseweb USA services you ordered, domain name registration information, the IP addresses assigned to you, your customer ID, Service Fees owed and received, the use of Leaseweb USA services or any other information related to your account.
- Your contact with Leaseweb USA – such as a notes or recordings of any call you make to Leaseweb USA, a chat records when you engage in a chat session with Leaseweb USA, an emails or letters you send to Leaseweb USA or other records of any contact you have with Leaseweb USA.
- Information about your payment method, such as credit card number, bank account number or other banking information.
- Information provided by you to Leaseweb USA when you notify Leaseweb USA of a (suspected) breach of Leaseweb USA's acceptable use policies.
- Video footage of you when you are in a Leaseweb USA datacenter or the public space outside and inside our offices.
- Photo of you when you access a data center by using a personalized ID badge.
- Your biometric data including fingerprint when you access a data center.
- Documents and information that certify your identity.

WHY LEASEWEB USA PROCESSES YOUR PERSONAL DATA IN OUR ROLE AS DATA CONTROLLER

Leaseweb USA may process your Personal Data to:

- Process your Orders and Sales Contracts and provide services, which may include performing customer verification.
- Process vendor contact details for the procurement of services, and communicating with vendors to provide information about services of Leaseweb USA and affiliated entities.
- Conduct market research, retention and customer satisfaction surveys, (direct) marketing activities (including through email newsletters, social media and onsite/offsite and online/offline advertisement), sales activities including to make (personalized) offers and quotations and offer promotions.
- Communicate with customers to (i) provide information about services of Leaseweb USA (ii) provide information about offers, Orders and Sales Contracts, provision of services, order status and payment, (iii) provide support and maintenance services, (iv) handle complaints, and (v) to answer questions from (potential) customers.
- Perform financial processes, including to (i) calculate, invoice and collect Service Fees, (ii) process financial transactions regarding the acceptance of Orders, and (iii) grant debt collection rights to third parties.

- Investigate creditworthiness and risk management, including prevention overextending credit to (potential) customers and verify whether (potential) customers will be able to comply with financial obligations.
- Manage and improve our services;
- Investigate and process suspected violations of Leaseweb USA's Policies.
- Ensure the security of persons, goods and objects, and perform fraud detection.
- Conduct legal processes and comply with legal requirements, including in relation to legal proceedings, and evidence gathering processes, and complying with court orders.
- Comply with legal and statutory obligations, including to (i) provide of data to authorized authorities in the context of criminal investigations, (ii) comply with applicable data retention obligations, and (iii) the provision to third parties of Data concerning customers in connection with an infringement of these third parties' rights.
- Establish the identity of customers or third parties, including provide access to data centers and our offices.

SHARING YOUR PERSONAL DATA WITH THIRD PARTIES IN OUR ROLE AS DATA CONTROLLER

Leaseweb USA may share Data about you with:

- Suppliers involved in delivering the services you've ordered with Leaseweb USA.
- Credit reference, fraud prevention or business scoring agencies, or other credit scoring agencies.
- Domain name registries when Leaseweb USA registers a domain name on your behalf.
- Debt collection agencies or other debt recovery organizations.
- Law enforcement agencies, regulatory organizations, courts or other public authorities to the extent required by law.
- A Leaseweb USA customer, if you notify Leaseweb USA that this customer use of Leaseweb USA services violates the Leaseweb USA's Policies or applicable laws.
- A third party that has claimed that your use of the Leaseweb USA services violates the Leaseweb USA's Policies or applicable laws (to the extent such sharing is required by law).
- We may disclose information when we believe disclosure is appropriate in connection with efforts to investigate, prevent, or take other action regarding illegal activity, suspected fraud, or other wrongdoing; to protect and defend the rights, property, or safety of our company, our employees, our customers, or others; and to enforce our terms and other agreements.
- If you have consented to additional disclosure of certain personal information, we may also disclose that personal information consistent with your consent.

ACCOUNTABILITY FOR ONWARD TRANSFER OF PERSONAL DATA

Leaseweb USA may transfer Personal data for the specified purposes described above to a third party acting as a data controller. If we intend to disclose Personal Data to a third party acting as a data controller we will comply with, and protect, Personal Data as provided in the Accountability for Onward Transfer Principle. Leaseweb USA maintains written contracts with these third parties and require that these third parties provide at least the same level of privacy protection and security as required by the EU-U.S. DPF Principles and the UK Extension to the EU-US DPF, and the Swiss-U.S. PDF.

To the extent provided by the Principles, Leaseweb USA remains responsible under the EU-U.S. DPF Principles, the UK Extension to the EU-US DPF, and the Swiss-U.S. DPF if a third-party that it engages to process personal information on its behalf does so in a manner inconsistent with the EU-U.S. DPF Principles, the UK Extension to the EU-US DPF, and the Swiss-U.S. Data Privacy Framework unless we prove that we are not responsible for the event giving rise to the damage.

LEASEWEB USA IN ITS ROLE AS DATA PROCESSOR

Personal Data hosted, transmitted or processed on infrastructure owned by you (Co-location) or leased by you from Leaseweb USA is governed by this paragraph and the Leaseweb Data Processing Agreement between Leaseweb and its customer. The customer of Leaseweb USA that owns or has leased Leaseweb USA infrastructure, determines the purposes and means of the processing of Personal Data and therefore is to be considered the data controller in regards to such processing. If at any time Leaseweb USA processes and/or stores personal data on infrastructure owned by a Leaseweb USA customer or leased from Leaseweb USA, then Leaseweb USA shall be a data processor, and any actions performed by Leaseweb USA in relation to such data shall be solely governed by the Sales Contract concluded between us and the Leaseweb USA customer.

DATA RESIDENCY

Leaseweb USA provides cloud hosting services from several data centers located in the USA. Your data on your own infrastructure or on Leaseweb USA's infrastructure is hosted by Leaseweb USA in the data center of your choosing in the USA.

DATA SOVEREIGNTY

Leaseweb USA has no possession, custody, or control over any Personal Data that is stored in the E.U. or that controlled by other Leaseweb Sales Entities.

LEGAL GROUNDS

To process your information as described above, we rely on the following legal bases:

- **Performance of a contract:** the use of your information may be necessary to perform the contract that you have with us. For example, if you use our services, we will use your information to carry out our obligation to complete and administer that service under the contract that we have with you.
- **Legitimate interests:** the processing is necessary for the purposes of the legitimate interests pursued by us, namely for information security. We also want to provide you with the best suitable content of the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.
- **Consent:** For certain direct marketing purposes, you are free to withdraw your consent at any time. See also the section '**CONSENT AND WITHDRAWAL OF CONSENT**'.

RETENTION PROCEDURES

Leaseweb USA will store your Personal Data as long as necessary to perform the purposes of processing as stated in this Privacy Statement.

COMPLAINTS AND PRIVACY OFFICER

You also have a right to file a complaint about our privacy practices with the relevant supervisory authority, but we respectfully invite you to contact us first, as we would like to do our best to resolve any concern you may have. Complaints should be emailed to our privacy officer, Richard Copeland. Our privacy and/or legal team(s) will review the complaint, communicate about it with the business team and/or complaining party as appropriate, and attempt to reach a resolution. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator.

Richard Copeland has been appointed as our Leaseweb USA privacy officer. Please contact him using the contact details below.

YOUR RIGHTS AND CHOICES

Subject to some limits, you have a number of rights regarding your Personal Data and the processing thereof. Please note that our customers control and maintain access to their data that is stored by Leaseweb USA, and we may not have access to the data maintained by our customers or even to know what data is being maintained. To the extent that we can honor your requests:

- You can view and, if necessary, change your Personal Data in your account at any time.
- If you wish to know what information Leaseweb USA has collected about you.
- You also have the right to obtain from us the erasure of your Personal Data after the termination of the Sales Contract ("Right to be Forgotten") in case and to the extent duly required and permitted.
- In addition, you may, under certain circumstances, have the right to restriction of the processing of your Personal Data.
- You have the right to object, on grounds relating to your particular situation, at any time to processing of your Personal Data.
- You have the right to receive your Personal Data, which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller when the processing is based on your consent or is necessary for the performance of a contract.

If you would like to opt out of certain messages, please contact us as described at the end of this Privacy Statement. Leaseweb USA also offers optional email newsletters to which you may subscribe on the Website and unsubscribe by following the instructions contained in the newsletter emails.

We do not handle or monitor browser-based "Do Not Track" signals, but, depending on your jurisdiction, you may have the ability to control certain cookies and similar tracking technologies. Below, we describe various options for adjusting your preferences for our use of various technologies on the Website in a particular browser. For most of the cookie preference options described below, your opt-out will be stored as a cookie. That means that you can undo your opt-out by manually clearing the cookies in your browser or by using a browser that automatically clears cookies. Depending on where you are and some other factors, this may reactivate the sorts of cookies that your previous preference had stopped. If you do that and then decide to opt-out again for that browser, you will need to perform the relevant opt-out steps again in that browser.

Depending on your jurisdiction, you may be able to adjust your preferences about how certain cookies and certain similar technologies are used on our Website by clicking on the Cookie Preferences link in the Website's footer. You should repeat this process with each browser you use to visit the Website. Google also allows you to install a [Google Analytics Opt-out Browser Add-on](#) in some kinds of browsers.

To learn more about interest-based advertising generally, or to use a different method to opt out of targeted, interest-based ads by some of our current ad service partners, visit [aboutads.info/choices](#) or [youronlinechoices.eu](#) from each browser you use.

In addition, you may be able to set your web browser to refuse certain types of cookies, or to alert you when certain types of cookies are being sent.

Some browsers offer similar settings for HTML5 local storage, and Flash storage can be managed as described here. However, if you block or otherwise reject our cookies, local storage, JavaScript, or other technologies, certain websites (including some of our own Websites) may not function properly. If you replace, change, or upgrade your browser, or delete your cookies, or use a browser that automatically clears cookies, you may need to use these opt-out tools again.

Please visit your mobile device manufacturer's website (or the website for its operating system) for instructions on any additional privacy controls in your mobile operating system, such as privacy settings for device identifiers and geolocation. Please note, however, that we do not respond to browser-based "Do-Not-Track" signals at this time.

Leaseweb acknowledges that EU, Swiss and UK individuals have the right to access the Personal Data that we maintain about them. An EU, Swiss and/or UK individual who seeks access, or who seeks to correct, amend, or delete inaccurate data, should direct their query to us-privacy@us.leaseweb.com. If requested to remove Personal Data, we will respond within a reasonable timeframe.

If you have any requests regarding the abovementioned, please contact us using the contact details below. If we do not grant your request, we will inform you about the reason why.

For information about Californians' privacy rights under California law, including how to exercise those rights, please see below. If you wish to exercise any other privacy or data protection rights, please contact us as described at the end of this Privacy Statement. Your request should include your name, company name, email address, and physical address. Leaseweb will endeavor to address all requests as quickly as possible, but in no more than 30 days.

CONSENT AND WITHDRAWAL OF CONSENT

You are entitled to withdraw your consent at any time by opting out from the direct marketing messages. However, if you decide not to provide certain Personal Data, or if you withdraw your consent thereto at a later moment, this may have affect how you experience our marketing for similar services. Upon receipt of your opt-out request, we will opt-out you from the direct marketing messages list.

RETENTION OF INFORMATION

Leaseweb will retain your personal information until we determine it no longer is needed to fulfill the purposes outlined in this Privacy Statement, unless the law requires us to keep it for a longer period of time. To provide security and business continuity for the activities described in this Privacy Statement, we make backups of certain data, which we may retain for longer than the original data.

TECHNICAL AND ORGANIZATIONAL SECURITY PROCEDURES

In view of the EU GDPR, Leaseweb has taken and will maintain the appropriate technical and organizational security measures for protection of the security, confidentiality and integrity of Customer's Personal Data as described below.

Leaseweb not only assures a level of security but also of cybersecurity and business resilience which follow from Leaseweb obtaining the following certifications and assurance reports: ISO 27001, SOC1, PCI DSS.

TECHNICAL MEASURES

- **Data Encryption:**

- Full disk encryption of all Leaseweb managed employee endpoints (data at rest).
- Leaseweb has strong cryptography & security protocols with respect to data transmission via TLS or VPN (data in transit).

- **Access Controls:**

- Access permissions based on least-privilege and need-to-know.
- We have policies and procedures in place for on- and offboarding of Leaseweb employees with regards to access management.
- Robust authentication and password related policies are in place and monitored.
- Tools are made available to enable Leaseweb employees to work securely (such as password manager, VPN client, endpoint protection on all Leaseweb employee endpoints).

- **Secure Development:**

- Code changes require a six-eyes principal.
- (Security) Configuration of servers is based on infrastructure-as-code where possible.
- All development teams are audited by the Leaseweb's security team twice a year based on a security maturity model.
- Segregation between development, test and production environments.
- Version control on Leaseweb's codebase.

- **Network Security:**

- Network segmentation on Leaseweb's internal networks.
- Firewalls are used in Leaseweb's internal network.
- Intrusion detection systems are used within Leaseweb's internal network.

- **Vulnerability Management:**

- Anti-virus software with EDR capabilities is installed on every Leaseweb employee endpoint to detect and stop the abuse of vulnerabilities.
- Vulnerability monitoring, pentesting and red-teaming exercises are performed.

ORGANIZATIONAL MEASURES

- **Information Security Governance:**

- Leaseweb operates an Information Security Management System ("ISMS"), conforming to the ISO 27001 standard.
- This ISMS is audited on an annual basis by internal as well as external auditors.
- Periodic contact with interested parties, such as security service providers, government and peer organisations to exchange threat intelligence and vulnerability information.
- Leaseweb has a dedicated IT Security department.

- **Data Deletion:**

- Wiping of Leaseweb equipment in use by Customer after termination of the Sales Contract.
- Physical destruction of broken hard drives.
- Secure paper disposal facilities are available.

- **Employee Training:**

- Leaseweb employees have periodic mandatory security awareness training with varying topics including privacy awareness.
- Periodic phishing simulations for all Leaseweb employees.

- **Risk management:**

- Security risk assessments are performed on a periodic basis.
- A security risk register is maintained and updated.

- **Vendor Management:**

- Periodic vendor screening to evaluate and manage risks related to existing and new vendors.
- **Physical Security:**
Data centers and offices are secured to prevent unauthorized access:
 - Periodic reviews of physical security authorizations.
- **Documentation and Record-Keeping:**
 - Leaseweb maintains records of security policies and procedures.
 - Records are kept in our internal documentation and are updated periodically.
- **Continuous Monitoring of Leaseweb's internal IT environment by:**
 - Security information and event management ("SIEM") tooling
 - A third-party Security Operating Center ("SOC") that monitors the internal IT environment.
- **Audits and certifications:**
 - Internal auditing: Leaseweb performs internal audits on security related controls on a yearly basis.
 - External auditing:
 - PCI-DSS 4.0 certified
 - ISO 27001:2022 certified
 - HIPAA assurance report
- All employees of Leaseweb USA that have access in the U.S. to Personal Data are also responsible for acting consistent with this Privacy Statement.

GDPR COMPLIANCE FOR EU, UK AND SWISS CUSTOMERS OF LEASEWEB USA

On July 10, 2023, the European Commission adopted an Adequacy Decision for the EU-US Data Privacy Framework, the Adequacy Decision ensures an adequate level of protection comparable to that of the EU for transfer of personal data from the EU to the US, following the judgment of the Court of Justice of the European Union (CJEU) in the Case C-311/18 ("Schrems II"). Leaseweb USA is self-certified to Data Privacy Framework and processes Personal Data in compliance with the Data Privacy Framework Principles.

Leaseweb USA complies with the EU-U.S. Data Privacy Framework ("Data Privacy Framework"), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF as set forth by the U.S. Department of Commerce. Leaseweb USA has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles ("EU-U.S. DPF Principles") with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Leaseweb USA has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles ("Swiss-U.S. DPF Principles") with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this Privacy Statement and the EU-U.S. DPF Principles, the UK extension to the EU-U.S. DPF and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

If you are a resident of the European Economic Area (EEA), and your Personal Data is transferred to the USA, we will:

- Implement appropriate safeguards to protect your Personal Data.
- Process your Personal Data necessary for the performance of the contract we have with you and upon Leaseweb's legitimate interests.

This Privacy Statement applies also to Personal Data transferred by Customers from European Union to Leaseweb USA. Leaseweb USA in its role as data importer and processor under the GDPR, will comply with the EU-U.S. DPF Principles, the UK Extension to the EU-US DPF, and the Swiss-U.S. DPF regarding the collection, use and retention of EU Personal Data that is transferred to the United States. This Privacy Statement is also notice to Data Subjects covered by this Privacy Statement about Leaseweb USA's data practices regarding Personal Data received by Leaseweb USA in the U.S. pursuant to the Data Privacy Framework from customers residing in the European Union.

ADEQUATE LEVELS OF PROTECTION FOR PERSONAL DATA TRANSFERRED TO LEASEWEB USA IN THE UNITED STATES WHICH WILL BE INCLUDED IN THE DATA PROCESSING AGREEMENT FOR ITS EU BASED CUSTOMERS:

- Leaseweb USA Inc. has no US based head office or shared services center acting as centralized mother entity in the USA, and Leaseweb USA acts as an independent distinct sales entity under its Sales Contracts separately without any USA based head office receiving or importing data from Leaseweb USA or from other Leaseweb sales entities. The European GDPR rules apply to its global head office in The Netherlands and thereby it is Leaseweb USA's approach to comply with the GDPR to the extent possible.
- Leaseweb USA can act as supplier and deliver services to customers located in the EU that in their role as data exporters whereby, Leaseweb USA shall encrypt all transfers of the personal data between Leaseweb USA as data importer and the EU based customer as the data exporter. That encryption applied by LSW USA can prevent the acquisition of such data by governmental authorities and other third parties who may gain physical again physical access to the hosting and computing environment and transmission mechanisms (e.g., servers, wires and cables) while the data is in transmission. Leaseweb USA can also use secure data transport through TLS 1.2 over HTTPS. This feature can be enabled so that U.S. law enforcement or intelligence authorities will be unable to tamper with or tap into the data transfers between the two end-points (Leaseweb USA and our customers).
- Leaseweb USA is not eligible to receive "upstream" or bulk surveillance orders under FISA § 702.
- Leaseweb USA does not provide any assistance to U.S. authorities conducting surveillance under Executive Order 12333.

- Leaseweb USA will use all available legal mechanisms to challenge any demands for data access through national security process it receives as well as any non-disclosure provisions attached thereto.
- Additionally, as a remote computing service ("RCS"), Leaseweb USA is subject the Electronic Communications Privacy Act, 18 U.S.C. § 2701, et seq. ("ECPA"), which provides protection to its customers. For example, ECPA prohibits governmental entities from seeking information about customers of services like Leaseweb USA unless such governmental entities first obtain appropriate legal process approvals, including a court order or search warrant for information other than basic subscriber information. Likewise, both FISA and ECPA provide Leaseweb USA's customers with redress against the United States government if it improperly obtains information about them.

RE COURSE MECHANISM UNDER DATA PRIVACY FRAMEWORK

Leaseweb USA's participation in the Data Privacy Framework is subject to regulatory investigation and enforcement by the Federal Trade Commission. Leaseweb USA commits to resolve complaints about your privacy and our collection or use of your Personal Data. Data Subjects with inquiries or complaints regarding this Privacy Statement should first contact Leaseweb USA at: us-privacy@us.leaseweb.com.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Leaseweb USA, Inc. commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to BBB National Programs DPF, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit [BBB National Programs Dispute Resolution Process](https://www.bbb.org/us-principles-dispute-resolution-process) for more information or to file a complaint. The services of BBB National Programs DPF are provided at no cost to you.

An individual may under certain conditions initiate binding arbitration by delivering a Notice to Leaseweb USA, following the procedures and subject to conditions set forth in Annex 1 of the DPF Principles. For more information on this principle, please visit <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>.

Leaseweb USA agrees to periodically review and verify its compliance with the Data Privacy Framework, and to remedy any issues arising out of failure to comply with the EU-U.S. DPF Principles, the UK Extension to the EU-US DPF, and the Swiss-U.S. DPF. Leaseweb USA acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of Data Privacy Framework participants.

STATEMENT CHANGES

Leaseweb USA may modify or amend this Privacy Statement from time to time as our business practices and legal requirements evolve. If this Privacy Statement is modified, Leaseweb USA will provide notice of the change by posting the updated Privacy Statement on the Leaseweb website www.leaseweb.com. Leaseweb NL advises you to check this page regularly to see if any changes have been implemented.

CONTACT INFORMATION

If you have any requests, questions or suggestions about Leaseweb USA's privacy practices, please send an email to us-privacy@us.leaseweb.com or call +1 571 814 3777.

Leaseweb USA, Inc. 9301 Innovation Drive, Suite 100, Manassas, Virginia 20110, U.S.A.

If you are a California resident, California law requires us to provide you with information regarding how we collect, use, and share your “personal information” as defined in the California Consumer Privacy Act (“CCPA”). This California Privacy Statement provides information about Leaseweb USA’s, collection, storage, use, and sharing practices for personal information from California residents that visit the Leaseweb website collected on www.leaseweb.com (“Website”). If you are not a California resident, this California Privacy Statement does not apply to you.

HOW LEASEWEB USA USES COOKIES

This Website uses cookies to personalize content and ads, to provide social media features, and to analyze our traffic. We also share information about your use of our Website with our social media, advertising, and analytics partners who may combine it with other information that you’ve provided to them or that they have collected from your use of their services.

If you would like to know more about our cookie Statement, including a list of the cookies used on our Website, please visit our Website at: www.leaseweb.com/legal/website-terms-of-use-and-cookie-statement.

Please note that you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the “Help” section of your browser for more information (e.g., Internet Explorer; Google Chrome; Mozilla Firefox; or Apple Safari).

SALE OF PERSONAL INFORMATION

By using the Leaseweb Website, Leaseweb USA shares certain pieces of personal information with third parties, such as the Leaseweb’s user Website and internet activity and related network device activity, to deliver interest-based advertising. This use of your personal information for these purposes may be considered a “sale” under the California Consumer Privacy Act. California residents have the right to opt out of the sale of personal information by contacting us-privacy@us.leaseweb.com.

Your browser may also offer a way to activate the Global Privacy Control signal (“GPC”). The Website treats qualifying browsers for which the user has activated the GPC signal as having opted out of what CCPA calls a “sale” or “sharing” of any California personal information that is collected on that site from that browser using cookies and similar technology. You can override that treatment for a GPC-enabled browser by using the cookie controls available via the Cookie Preferences link in the Website’s footer to opt into particular categories of cookies from that browser. In that case, “sales” and “sharing” via cookies and similar technology in those categories may resume on that browser.

Opting out of “sales” and “sharing” limits only some types of disclosures of personal information, and there are exceptions to all of the rights described in this Section.

OPTING OUT OF INTEREST-BASED ADVERTISING

Leaseweb USA uses or participates in each of these services to deliver interest-based advertising. To opt-out, you will need to visit each of the following websites for more information and follow their instructions to use their opt-out tools.

- Twitter: <https://twitter.com/settings/account/personalization>
- The Digital Advertising Alliance: <https://optout.aboutads.info/>
- Google Ad Settings: www.google.com/settings/ads
- LinkedIn Ad Settings: <https://www.linkedin.com/help/linkedin/answer/90274/manage-your-linkedin-ads-settings?lang=en>

Many of these tools use cookies to store your opt-out preferences on your specific browser or device. You must opt-out on each device and on each browser to exercise your rights. If your browser blocks cookies (or if you choose to delete them from your browser), your opt-out preferences may not be effective. We do not control the out-out mechanisms listed above and are not responsible for their operation.

Note that we may still deliver advertising to you that is not tailored to you based on your personal information, and that we may still use your personal information for other purposes such as analytics, measurement and attribution. We may also share your personal information with third parties for other purposes in accordance with this California Privacy Statement.

NOTICE CONCERNING DO NOT TRACK. Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We are committed to providing you with meaningful choices about the information collected on our Website for third party purposes, and that is why we provide the opt-out mechanisms listed in the “Sale of personal information section” above. However, we do not currently recognize or respond to browser-initiated DNT signals.

YOUR CALIFORNIA PRIVACY RIGHTS

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.
- Provide access to and/or a copy of certain information we hold about you.
- Delete certain information we have about you.
- Opt-out of the sale of personal information from or about you, as described above.

LINKS. Our Website may contain links to third party websites and functionalities. If you choose to use these third party services, you may disclose your information not just to those third parties, but also to their users and the public more generally depending on how their services function. Leaseweb USA is not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your information will be subject to the privacy policies of the third party websites or services, and not this Notice. We urge you to read the privacy and security policies of these third parties.

CHANGES TO THIS PRIVACY STATEMENT

Leaseweb USA reserves the right to change this Privacy Statement and will post any revisions on the Leaseweb website. We advise you to check this page regularly to see if any changes have been implemented.

CONTACT INFORMATION

If you would like to contact us about any provisions of this Privacy Notice or you have any questions about how your information is processed, please contact us at us-privacy@us.leaseweb.com.

This Section applies only to “personal information” about California residents, as that term is defined in the California Consumer Privacy Act (“CCPA”), and it supplements (and, in some cases, repeats) the information in the rest of our Privacy Statement above. Data about individuals who are not residents of California is handled differently and is not subject to the same rights described in this Section. This Section does not apply to data that Leaseweb USA handles in its capacity as a processor for its customers, even when such data is about a resident of California, or to other data or activities that are not subject to the relevant provisions of the CCPA.

A. COLLECTION, RETENTION, AND USE OF CALIFORNIA PERSONAL INFORMATION

During the 12 months leading up to the effective date of this Privacy Statement, Leaseweb USA collected the categories of personal information described below. We intend to retain this information for as long as we feel it is necessary for the purposes described further below, or for any longer period required by law. Because we may collect and use the same category of personal information for different purposes and in different contexts, there is no general fixed retention period that always will apply to a particular category of personal information. Examples of how long we normally intend to retain personal information in certain situations are set forth below.

CATEGORY OF PERSONAL INFORMATION	EXAMPLES OF HOW LONG WE NORMALLY PLAN TO KEEP THIS INFORMATION
Identifiers and account information (such as name, username, physical address, email address, IP address assigned to you, customerID, documents to verify your identity, and other contact information)	<p>We may retain identifiers associated with points of contact within existing customers for the duration of the customer’s contract with Leaseweb USA, and for a length of time thereafter that for related administration and sales purposes.</p> <p>The length of time for which we retain the information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.</p>
Commercial information (such as information provided to us in your communications, transaction data, and information about interactions with Leaseweb USA or our partners, service fees owed, and any other information related to your account);	<p>We may retain information on a person’s interest in our products for up to 1 year after the person’s last interaction with Leaseweb USA, or for a length of time after the end of their organization’s contract with Leaseweb USA.</p> <p>The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.</p>
Financial data (such as payment information)	<p>We may retain financial data for 7 years in support of financial statements/filings and key financial or business process controls.</p>
Internet or other network or device activity (such as IP addresses, device identifiers, cookie data, device attributes, usage information, netflow data, metadata, and other information)	<p>We retain the network activity information of our existing customers for the duration of the customer’s contract with Leaseweb USA, and a the length of time thereafter for account authentication, fraud detection, and other cybersecurity purposes.</p> <p>The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.</p> <p>Information stored on Leaseweb USA servers at customers’ direction is maintained until deleted by the customer or until termination services.</p>
Professional or employment-related data (such as company name)	<p>We typically retain professional or employment data of our customers’ and prospective customers’ personnel for 1 year after the person’s last interaction with Leaseweb USA, or for a length of time after the end of a customer’s contract with Leaseweb USA.</p> <p>The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.</p>
Inferences drawn from any of the above	<p>We often retain inferences for the same period of time for which we retain the underlying data.</p>
Video footage of you when you are in a Leaseweb USA data center, or public spaces outside and inside our offices.	<p>The length of time for which we retain information depends on the purposes for which we collected and use it and/or as required to comply with applicable laws.</p>

LEASEWEB USES PERSONAL INFORMATION FOR THE FOLLOWING PURPOSES:

- Administer your account, including to process your registration and verify your information;
- Provide, manage, and improve our services;

- Conduct business operations in support of our services, such as auditing, security, fraud prevention, invoicing and accounting, sales and marketing, analytics, and research and development;
- Send messages that are related to services we provide (e.g., welcome messages, confirmation notices, and the like), your activity on the Website, or updates and changes to the Website or services, consistent with any applicable communications options we offer;
- Contact you regarding Leaseweb and third-party products, services, surveys, research studies, promotions, special events, and other subjects that we think may be of interest to you, consistent with any applicable communications options we offer;
- Send you other marketing and promotional communications, consistent with any applicable communications options we offer;
- Customize content, preferences, and advertising on the services, across the Internet and elsewhere;
- Create aggregated, de-identified, or anonymized information;
- Comply with laws, regulations, and other legal process and procedures; and
- Establish, exercise, or defend our legal rights.

OTHER DISCLOSURES OF PERSONAL INFORMATION

The following chart indicates the categories of personal information that we collected from Californians and the categories of third parties to whom we disclosed this data during the 12 months leading up to the effective date of this Privacy Statement.

CATEGORY OF PERSONAL INFORMATION	CATEGORIES OF ENTITIES TO WHOM WE DISCLOSED IT
Identifiers (such as name, username, physical address, email address, and other contact information)	<ul style="list-style-type: none"> Our affiliates. Third parties that assist us, such as our providers of technical services (e.g., providers of data storage, web hosting, security), marketing providers, analytics providers, payment processors, and other subcontractors. Joint marketing partners. Entities involved in dispute resolution (such as an arbitrator or an opposing party). Entities involved in potential or actual significant corporate transactions or events involving Leaseweb USA or its affiliates. Law enforcement authority or any other governmental authority.
Commercial information (such information provided to us in your communications, transaction data, information about interactions with Leaseweb or our partners);	Same as first row in this chart.
Financial data (such as payment information)	Affiliates and third parties that assist us, such as payment processors.
Internet or other network or device activity (such as IP addresses, device identifiers, cookie data, device attributes, device usage information, browsing information, metadata, and other information)	<ul style="list-style-type: none"> Our affiliates. Third parties that assist us, such as our providers of technical services (e.g., providers of data storage, web hosting, security), marketing providers, analytics providers, payment processors, and other subcontractors. <p>Please note that Leaseweb USA does not access or use cloud hosting customer content or customer data stored on its services at those customers' direction, except as directed by the customer or as required by legal process.</p>
Professional or employment-related data (such as company name)	<ul style="list-style-type: none"> Our affiliates. Third parties that assist us, such as our providers of technical services (e.g., providers of data storage, web hosting, security), marketing providers, analytics providers, payment processors, and other subcontractors.
Other information that identifies or can be reasonably associated with an individual	<ul style="list-style-type: none"> Our affiliates. Third parties that assist us, such as our providers of technical services (e.g., providers of data storage, web hosting, security), marketing providers, analytics providers, payment processors, and other subcontractors.
Inferences drawn from any of the above	<ul style="list-style-type: none"> Our affiliates. Third parties that assist us, such as our providers of technical services (e.g., providers of data storage, web hosting, security), marketing providers, analytics providers, payment processors, and other subcontractors.

We do not use or disclose "sensitive personal information" covered by this Privacy Statement and as defined in the CCPA in a manner that requires us to offer a special right to limit our use of this data under the CCPA due to its sensitive nature.

B. CCPA RIGHT TO ACCESS, CORRECT, OR DELETE PERSONAL INFORMATION

If you are a California resident, California law also may permit you to request that we:

- Provide access to and/or a copy of certain information we have about you;
- Delete certain information we have about you;
- Correct certain personal information we have about you; or
- Provide you the categories of personal information we have collected or disclosed about you in the last 12 months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; the categories of third parties with whom we shared personal information; and more specific detail about what categories of information were "sold," "shared," or disclosed to particular categories of third parties, similar to the detail above this Section of the Privacy Statement.

Certain information is exempt from such requests under California law. For example, we need certain information to provide our services to you, so we may reject a deletion request for that information while providing services to you.

Additionally, where Leaseweb holds information as a service provider to one of its customers, it may reject your request and direct you to submit requests to exercise the rights in these sections to the appropriate Leaseweb customer.

To request to exercise any of these rights and receive the fastest response, please email us as described at the end of this Privacy Statement. We will take steps to verify your identity to our satisfaction before responding to your request, which may include, depending on the type of request you are making, the sensitivity of any data you are requesting, and the nature of your relationship with us: verifying your name, asking you to click on a link that we send to your email address, requesting that you login to an account you maintain with us, or requesting that you provide us with information about our relationship that only you are likely to have.

C. REQUESTS MADE BY AGENTS

For security and legal reasons, we do not accept personal information requests that require us to use a third-party service (such as one operated by an agent) to view or respond to the requests. If you are an agent making a request on behalf of a consumer, we reserve the right to take steps to verify that you are authorized to make that request, which may include requiring you to provide us with written proof such as a notarized authentication letter or a power of attorney. We also may require the consumer to verify their identity directly with us. Because opt-out requests for sales made through cookies and related technology must be performed from each browser that is used to access our Services, it is easiest for the consumer to perform such opt-outs themselves. However, if a consumer wishes for an agent to perform browser-based requests on their behalf, the consumer may arrange for the agent to use the consumer's browser to make such requests. We are not responsible for the security risks of this or any other arrangements that a consumer may have with an agent. For clarity, this is not permission for any user to share their login credentials with an agent or any third party. Such sharing is prohibited and is not required for an agent to make requests under this Privacy Statement.

D. NONDISCRIMINATION

You also have a right not to receive "discriminatory treatment" (within the meaning of the CCPA) for the exercise of the privacy rights conferred by the CCPA.

CHANGES TO THIS PRIVACY STATEMENT

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