

YOUR PRIVACY IS IMPORTANT TO US

We respect your privacy and are committed to protecting your personal data. Symmetry Corporation and its United States (U.S.) affiliate Secure-24, LLC, (hereinafter collectively referred to as "Symmetry," "we," "us" or "our") comply with various laws/regulations regarding the protection of Personal Information (PI), Personally Identifiable Information (PII), Personal Financial Information (PFI), and Protected Health Information (PHI) data.

Symmetry complies with international and GDPR privacy laws, federal and applicable state privacy laws, as well as HIPAA, HITECH, and the Omnibus Rule to safeguard the privacy of PHI, and the recognized European Union (EU)-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of personal information transferred from the EU, United Kingdom, and Switzerland to the U.S. in reliance on Privacy Shield. Secure-24 and Symmetry are the covered entities for the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework.

Purpose and Scope

This privacy policy articulates Symmetry's practices for handling and protecting the privacy of information acquired, accessed, or retained for business purposes or to establish and maintain provided services. It outlines the types of information we gather, how we use it, and the notice and choice affected individuals have regarding our use of and their ability to correct that information. It also explains circumstances in which we may be required to disclose an individual's personal information to meet national security or law enforcement requirements.

Our privacy policy applies to all personal information, customer information, and marketing and sales contacts received by Symmetry, whether in electronic, paper, or verbal format. The privacy policy does not apply to the data collection practices of third parties, Symmetry customers, or any partners or affiliates of Symmetry.

Acceptance of Our Privacy Policy

The use of Symmetry's website (www.symmetrycorp.com) constitutes acceptance of this privacy policy.

Changes to Our Privacy Policy

Symmetry reserves the right to change this policy from time to time by updating this page, and the privacy policy may be amended consistent with the requirements of EU-U.S. and Swiss-U.S. Privacy Shield. When you visit our website, we invite you to this page to stay informed about any changes or updates that may have been made. This policy is effective from December 9, 2019.

DATA COLLECTED

Symmetry as a corporate entity handles, stores, and protects human resources/personnel data for the purposes of recruitment and administration of Symmetry employee and contractor relationships. Human resources/personnel data may include PI, PII, PFI, and/or PHI.

Symmetry as a service provider handles, stores, and protects customer data, which varies according to the purposes of the business services provided to potential and current customers, but often includes marketing and sales customer contact data to improve services and/or maintain marketing/customer relationships.

Furthermore, as part of the customer service relationship, Symmetry as a service provider acquires, stores, and transmits customer communications and customer operational information, which customers may regard as confidential, private, or sensitive. This customer classified data may or may not include PII, PFI, and/or PHI.

Symmetry uses a Data Protection Impact Assessment (DPIA) to outline the lawful basis for processing the data as it relates to the use of human resources/personnel data, marketing and sales customer contact data, customer communications, and customer operational information.

PERSONAL INFORMATION COLLECTED AND METHODS USED

Symmetry uses personal information to fulfill contractual requirements with Symmetry customers, to meet our legal and regulatory requirements, and to conduct common business activities, such as building brand awareness, engaging with prospective customers, and offering enterprise application management and cloud hosting solutions.

Personal information will be:

- Used only for the purposes identified at collection or in the notice and only if the individual has provided implicit or explicit consent, unless a law or regulation specifically requires otherwise.
- Retained for no longer than necessary to fulfill the stated purposes, or for a period specifically required by law or regulation.
- Disposed of in a manner that prevents loss, theft, misuse, or unauthorized access.

Prospective Employees/Contractors

The Symmetry Recruiting Privacy Policy explains our privacy practices in connection with an individual's application for employment at Symmetry. For details see <https://symmetrycorp.com/company/recruiting-privacy-policy/>.

Prospective Customers

Symmetry collects the following personal information from prospective customers:

- First name
- Last name
- Email address
- Phone number
- Company name
- Job title

During the sales process, Symmetry may also collect additional information from either the individual or their employer in order to facilitate communication (such as an alternate phone number or a business address). This information is collected through completion of an online form on the Symmetry website or a physical form at an event, or through correspondence with Symmetry, such as a phone call or email. Information collected during the sales process shall be retained only as long as there is a legitimate business use.

Customers

For individuals who are authorized by those companies who are our customers to access and use our services, Symmetry collects the following personal information from either the individual or their employer:

- First name
- Last name
- Email address
- Phone number
- Company name
- Job title

Symmetry may also collect additional information from either the individual or their employer in order to facilitate communication (such as an alternate phone number or the time zone in which the individual is located) and to identify and provide proof of identity for the individual (such as a PIN number or manager's name).

Individuals have the option to add an image to their customer portal account profile. Should an individual choose to upload an image of themselves, the image shall be retained until the time the individual removes it or submits a request to Symmetry requesting removal.

Vendors and Suppliers

For individuals who are designated as a Symmetry point of contact by those companies who are our vendors and suppliers, or who are prospective vendors and suppliers, Symmetry collects the following personal information from either the individual or their employer:

- First name
- Last name
- Email address
- Phone number
- Company name
- Job title

Symmetry may also collect additional information from either the individual or their employer to facilitate communication (such as an alternate phone number or a business address). Information collected during the bidding process from prospective vendors and suppliers shall be retained only as long as there is a legitimate business use.

Symmetry Headquarters and Data Center Visitors

In accordance with the Symmetry facility and data center access procedures, Symmetry collects the following personal information from individuals visiting Symmetry headquarters or data centers, such as prospective customers, customers, vendors, and suppliers:

- First name
- Last name
- Company name

Symmetry may also collect additional information from either the individual or their employer when needed for access approval at a data center (for example, city, state, and ZIP code). A government issued ID must be presented by individuals when visiting a Symmetry data center for identity verification purposes.

Video recordings are taken of people in data centers for protection of assets, incident prevention, and/or security/legal/contractual obligations. Data subjects are notified of video surveillance and recording through signs posted at the entrances to Symmetry data centers. A photograph may also be taken of a data center visitor if that visitor has been authorized to receive a badge for unescorted access to the data center. Recordings and images shall only be retained for as long as required for business use.

Website Visitors

For any visitor to the Symmetry website, Symmetry collects information about the referring source from which you access our site, including entry page URLs, and your level of interest in specific pages or information on our website. In addition, the technology we use to deliver and manage our website sometimes collects geolocation and IP addresses.

From individuals who complete an online form on the Symmetry website, Symmetry collects the following personal information:

- First name
- Last name
- Email address
- Phone number
- Mailing address
- Company name
- Job title
- Preferences on your interests in our product and services

Symmetry uses collected information to understand a website visitor's interest in our products and services and to provide timely, relevant information and overall better service. In particular, we use personal information for the following purposes:

- To improve our products and services, and better respond to customer service requests. For example, if a website visitor provides feedback to us on a product or service via an online form, we may use that information to support decisions on changes or enhancements.
- To coordinate the scheduling of meetings or data center tours if a website visitor completes a "contact us" or "schedule a visit" form.
- To administer a contest, promotion, survey or other site feature.
- To periodically send notifications about new products and special offers likely to be of interest. For example, if a website visitor attends a webinar on SAP HANA, we may send follow-up information on related promotions or research useful for strategic decisions and technology design.
- To customize the website content presented to align with a website visitor's expressed interests.
- To send technology and offering information relevant to expressed interest.

- To understand whether a website visitor is just casually researching a product or service or has a stronger interest.

This information shall be retained only as long as there is a legitimate business use.

Our website may contain links to enable you to easily visit other websites of interest. However, once you have used these links to leave our website, you should know that we do not have any control over other websites and their data collection practices. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting other websites. Other such websites are not governed by this privacy statement.

In addition, our website includes social media features, such as the Facebook, Twitter and LinkedIn buttons where you can easily link to additional Symmetry information on those platforms. These features may collect your information even if you do not click on those buttons. This Privacy Policy does not apply to these features. Your interactions with these features and companies are governed by the policies of the companies providing them.

Our third-party marketing service providers (CRM, CMS, advertisements, and lead generation) will also have access to website visitor's information in order to deliver marketing services. Symmetry uses the largest, most reputable providers, who offer their own privacy policy and mechanisms for exercising control over data. For example, we use Google AdWords to deliver advertisements. For those providers, Symmetry offers the following links to their privacy policy and related information to expedite the process of engaging these vendors:

- [Google](#) (AdWords, Analytics, and related Google Services)
 - You may also enable your browser settings to refuse cookies and exercise control over your information used by Google by visiting <http://www.networkadvertising.org/choices/> and [Google's Ad Settings](#).
- [Wistia](#)
- [Highspot](#)
- [HubSpot](#)
- [LeadLander](#)
- [AdRoll](#)
- [LinkedIn](#)
- [DiscoverOrg](#)
- [Facebook](#)
- [Twitter](#)
- [SurveyMonkey](#)

Teleconference Recordings

During the course of business, Symmetry may record teleconference meetings. Individuals are notified of teleconference meeting recordings through a flashing “recording in progress” icon, audio announcement, system announcement, or meeting invite message. Recordings shall only be retained for as long as required for business use.

Children’s Information

Symmetry does not knowingly market to, collect, or store personal information from individuals under the age of 16. Use of the Symmetry website shall be limited to individuals 18 years of age or older.

USE OF COOKIES

Cookies are small text files that are stored in your web browser that allow us or third parties to recognize you and your computer by storing small amounts of data on your computer about your visit to our website and your use of the services.

Symmetry uses a variety of cookies, some which are tied to the core functionality of our website and the services, and others that are tied to targeted advertising. Below is a list of the types of cookies that may be used with your browsing activity in our website and in the services and how you can manage the settings.

Type of Cookie	Description & Functionality	Managing Setting
Essential Cookies	Essential cookies allow you to navigate our website and use the services, e.g. accessing secure areas of the services using a username and password. These are first party cookies are sometimes called “strictly necessary” as without them we cannot provide much of the functionality that you need to use the services.	Because essential cookies are required to operate our website and the services, there is no option to opt out of these cookies.

Type of Cookie	Description & Functionality	Managing Setting
Functional Cookies	Functional cookies collect information about how our website is used, such as determining which pages are viewed most often. They also allow us to remember information you entered or choices you made while browsing our website or while using the services, e.g. your username and region. Functional cookies also allow us to provide enhanced, personalized features. We may also use these cookies to improve how our website functions and to provide you with more relevant communications, e.g. marketing communications.	You can manage the placement of functional cookies on your browser in your individual browser settings. Note: opting out of these cookies may impact the functionality of the services and your user experience. To learn how to control functional cookies via your individual browser setting, see the Browser Settings section below. To opt out of data collection by Google Analytics, you can download and install a browser add-on which is available here . See the list of cookies below for reference.
Targeting or Advertising Cookies	Targeting cookies may be set through the services by our advertising partners. They may be used by those partners to build a profile of your interests and show you relevant advertisements on other sites. If you do not allow these cookies, you will experience less targeted advertising. Targeting cookies do not directly store personal information but are based on uniquely identifying your browser and internet device.	To learn more about targeted advertising and targeting cookies and your ability to opt out, please visit the opt-out pages of WebChoices here ; if you are located in the EU, click here . In addition, you may opt out of other advertising-based cookies via TrustArc here .

Cookie Opt-Out Links

You have the right to decide whether to accept or reject cookies. You can exercise your cookie preferences by clicking on the appropriate opt out links provided below. Most advertising networks offer you a way to opt out of targeted advertising. Click [here](#) for more information. You can opt out of certain cookies [here](#) and if you are located in the EU, click [here](#).

Browser Settings

Many web browsers accept cookies by default. You can usually change your browser's settings to reject and/or to remove many cookies. On some browsers, you can choose to let a website place cookies, but choose to reject cookies from certain third parties (such as analytics companies and advertising companies). Please visit your browser's help or settings menu for more information. To learn more about how to control cookie settings through your browser:

- Click [here](#) to learn more about Private Browsing and managing cookie settings in Firefox.
- Click [here](#) to learn more about Incognito and managing cookie settings in Chrome.
- Click [here](#) to learn more about "InPrivate" and managing cookie settings in Internet Explorer.
- Click [here](#) to learn more about "Private Browsing" and managing cookie setting in Safari.

Please note that if you choose to reject or remove cookies, this may prevent certain features or certain parts of the services from working properly. Since your cookie opt-out preferences are also stored in a cookie on your website browser, please also note that if you delete all cookies, use a different browser, or buy a new computer, you will need to renew your opt-out choices.

For even more information on Cookies, see <https://www.allaboutcookies.org/>.

CONTROLLING YOUR PERSONAL INFORMATION

Choice and Consent

Symmetry shall offer individuals the opportunity to choose (to opt-in or opt-out) whether their personal information is (1) retained for the purpose of a potential or existing business relationship, (2) to be disclosed to a third party, or (3) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive personal information, Symmetry gives individuals the opportunity to affirmatively or explicitly (opt-out) consent to the use of their information or the disclosure of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Symmetry shall treat sensitive personal information received from an individual the same as the individual would treat it. The consequences of not providing consent is the inability of the requestor to access certain information and a lack of exchange of appropriate services between Symmetry and the requester, which is also subject to terms of any existing agreements between the parties. If there are any additional consequences for refusing to provide personal information or of denying or withdrawing consent to use personal information, individuals will be informed of this when the personal information is collected.

Symmetry is an international provider of technology services with primary locations in the U.S. and secondary locations in Europe. Symmetry strives to meet data protection requirements in both the U.S. and the European Economic Area (EEA). By accessing Symmetry's website and providing information to Symmetry, you consent to the transfer of the personal information to the U.S. You may revoke this consent at any time, which will not be able to be applied retroactively, but which Symmetry will respect going forward.

Onward Transfers/Disclosures to Third Parties

Personal information collected by Symmetry shall be disclosed to third parties only for the purposes described in the notice, and for which the individual has provided implicit or explicit consent, unless a law or regulation specifically requires or allows otherwise. Symmetry shall ensure that any Symmetry-procured third-party vendor/subcontractor for which personal information scoped to the EU may be disclosed, subscribes to the EU-U.S. and Swiss-U.S. Privacy Shield, or have adopted model contract clauses. Third parties who have legal agreements with Symmetry shall protect personal information in a manner consistent with the relevant aspects of Symmetry privacy policies or other specific instructions or requirements and are subject to law providing the same level of privacy protection as is required by the EU-U.S. and Swiss-U.S. Privacy Shield.

Symmetry shall take remedial action in response to misuse of personal information by a third-party vendor/subcontractor to whom Symmetry has disclosed such information. Prior to disclosing personal information to a third party for purposes other than which it was originally collected or subsequently authorized by the individual, Symmetry shall notify the individual of such disclosure and allow the individual the choice (opt-out) of such disclosure. In cases of onward transfer to third parties (vendors/subcontractors) of data of EU, UK, and Swiss individuals received pursuant to EU-U.S. and Swiss-U.S. Privacy Shield, Symmetry is liable unless Symmetry proves that it is not responsible for an event giving rise a potential damage.

Law Enforcement and National Security Requests

Symmetry may be required to disclose an individual's personal information in response to a lawful request by public authorities, including to meet national security or law enforcement requirements.

Data Security

Symmetry shall take reasonable steps and has put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information from loss, misuse, unauthorized access or disclosure, alteration or destruction. Further, Symmetry requires that employees keep customer information confidential. Symmetry cautions its customers and website visitors that no medium of communication, including the internet, is entirely secure. Accordingly, Symmetry cannot guarantee the security of information on or transmitted via the internet and is not responsible for loss, corruption or unauthorized acquisition and use of personal information provided to our website, or for any damages resulting from such loss, corruption, unauthorized acquisition or unauthorized use.

Data Integrity

Individuals are responsible for providing Symmetry with accurate and complete personal information, and for contacting Symmetry if correction of such information is required. Symmetry shall only process personal information in a way that is compatible with and relevant for the purpose for which it was collected or authorized by the individual. To the extent necessary for those purposes, Symmetry shall take reasonable steps to ensure that personal information is collected and maintained so that it is accurate, complete, current and reliable for its intended use.

ACCESS TO YOUR PERSONAL INFORMATION

Your Right to Access Your Personal Information

Symmetry acknowledges that individuals have the right to access the personal information that we collect and maintain about them and shall, upon request, allow an individual access to their personal information.

An individual who seeks access, or who seeks to correct, amend, or delete data under the right to erasure, should direct the query to PrivacyNotice@secure-24.com. If requested to remove data, we will respond within 30 days.

Personal information will be provided to the individual in a concise, transparent, intelligible, and easily accessible form, in a reasonable timeframe, and at a reasonable cost, if any.

Updating, Correcting, Amending, or Deleting Your Personal Information

Symmetry shall, upon request, allow data subjects to update, correct, amend or delete personal information held and controlled by Symmetry, except where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual in the case in question or where the rights of persons other than the individual would be violated. If practical and economically feasible to do so, Symmetry shall provide such updated or corrected information to third parties that previously were provided with the individual's personal information.

Symmetry cannot process direct requests from data subjects to update, correct, amend, or delete personal information controlled by its customers. Such requests will be routed to the appropriate customer privacy representative. Handling of such requests and communication with data subjects where Personal information is controlled by Symmetry's customers is the responsibility of each customer. Symmetry will assist customers with such requests pursuant to the Master Service Agreement (MSA) or Statement of Work (SOW).

Identity Confirmation

Symmetry shall authenticate the identity of individuals who request access to their personal information before they are given access to that information.

Denial of Access to Your Personal Information

Symmetry shall inform individuals, in writing, of the reason a request for access to their personal information was denied, the source of the entity's legal right to deny such access, if applicable, and the individual's right, if any, to challenge such denial, as specifically permitted or required by law or regulation.

Denial of Correction of Personal Information

Symmetry shall inform individuals, in writing, about the reason a request for correction of personal information was denied, and how they may appeal.

EU-U.S. and Swiss-U.S. Privacy Shield Framework

Symmetry complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from the EU, the United Kingdom, and Switzerland to the U.S. in reliance on Privacy Shield. Symmetry has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the policies in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit <https://www.privacyshield.gov/>.

Enforcement/Monitoring

Symmetry uses self-assessment and monitoring to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Privacy Shield Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with the Privacy Shield Principles.

Symmetry is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

DISPUTE RESOLUTION

If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using (an independent resource mechanism) as a third-party resolution provider. Complaints regarding this privacy policy should first contact Symmetry at:

Secure-24, LLC

Attn: Jaclyn Miller, Chief Security Officer/Privacy Officer

Devin Iler, Security Governance and Privacy Manager

26955 Northwestern Highway, Suite 200

Southfield, MI 48033

Email: PrivacyNotice@secure-24.com

In compliance with the EU-U.S. and Swiss-U.S. Privacy Shield Principles, Symmetry commits to resolve complaints about your privacy and our collection or use of your personal information. EU, United Kingdom, and Swiss individuals with inquiries or complaints regarding this privacy policy should first contact Secure-24, LLC at:

Secure-24, LLC

26955 Northwestern Highway

Southfield, MI 48033

PrivacyNotice@secure-24.com

Phone: 248-784-1021 ext. 5545

Symmetry has further committed to refer unresolved privacy complaints under the EU-U.S. and Swiss-U.S. Privacy Shield Principles to BBB EU PRIVACY SHIELD, a non-profit alternative dispute resolution provider located in the U.S. and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit www.bbb.org/EU-privacy-shield/for-eu-consumers/ for more information and to file a complaint.

Please note that if your complaint is not resolved through these channels, under limited circumstances, a binding arbitration option may be available before a Privacy Shield Panel.

For all types of inquiries or complaints, please download our [Privacy Inquiry/Complaint Form](#), which has convenient fillable fields and further instructions on how to contact us regarding privacy.

Human Resources Data Complaints

Symmetry has further committed to cooperate with the panel established by the EU data protection authorities (DPAs), the UK Information Commissioner's Office (ICO), and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU, UK, and Switzerland in the context of the employment relationship.