

## DATA PRIVACY POLICY

### 1. Policy Statement

OculusIT is committed to protecting the privacy and confidentiality of Personal Information about its employees, customers, business partners and other identifiable individuals. OculusIT's policies, guidelines and actions support this commitment to protecting Personal Information. Each employee bears a personal responsibility for complying with this Policy in the fulfillment of their responsibilities at OculusIT.

### 2. Scope

This Policy sets the minimum standard and shall guide all employees and Agents even if local law is less restrictive. Supplemental policies and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental policies and practices may provide for more strict or specific privacy and protection standards than are set forth in this Policy.

### 3. Policy Details

3.1. OculusIT respects the privacy of its employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment and recognizes the need for appropriate protection and management of Personal Information. OculusIT is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

3.2 Notice. When collecting Personal Information directly from individuals, OculusIT strives to provide clear and appropriate notice about the:

- Purposes for which it collects and uses their Personal Information,
- Types of non-Agent third parties to which OculusIT may disclose that information, and
- Choices and means, if any, OculusIT offers individuals for limiting the use and disclosure of their Personal Information.

3.3 Choice. Generally, OculusIT offers individuals a choice regarding how we Process Personal Information, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required when Processing Personal Information for:

- Purposes consistent with the purpose for which it was originally collected or subsequently authorized by the individual,
- Purposes necessary to carry out a transaction relationship,
- Purposes necessary to comply with legal requirements, or
- Disclosure to an Agent.

3.4 Accountability for Onward Transfer. In regard to the transfer of Personal Information to either an Agent or Controller, OculusIT strives to take reasonable and appropriate steps to:

- Transfer such Personal Information only for specified purposes and limit the Agent or Controller's use of that information for those specified purposes,
- Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Policy,
- Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Policy,
- Require the Agent or Controller to notify OculusIT if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and
- Upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.

3.5 Security. OculusIT takes reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the Processing and the nature of the Personal Information.

3.6 Data Integrity and Purpose Limitation. OculusIT will only Process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. OculusIT shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use.

3.7 Access. OculusIT provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been Processed in violation of the OculusIT data privacy principles.

3.8 Recourse, Enforcement and Liability. Violation of this Policy by an employee or contractor of OculusIT will result in appropriate discipline up to and including termination. Violation by an Agent,

Controller or other third party of this Policy or OculusIT's privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

#### 4. Purpose of Collecting and Use of Personal Information

OculusIT may share Personal Information with its business partners, vendors, service providers and suppliers to the extent needed to support the customers' business needs. Suppliers are required to keep confidential Personal Information received from OculusIT and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

OculusIT collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to OculusIT facilities and computer networks, employee profiles, internal employee directories, Human Resource record keeping, and other employment related purposes. OculusIT also collects and uses Personal Information to consider candidates for employment opportunities within OculusIT. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to OculusIT in connection with these Human Resources programs and functions. OculusIT will not share Human Resources Data with third parties for non-employment related purposes. OculusIT requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Policy and as required by applicable law.

#### 5. Administration

5.1 Roles and Responsibilities. Responsibility for compliance with this Policy rests with the heads of the individual functions, business units and departments together with any individual employees collecting, using or otherwise Processing Personal Information. Business unit, function and department heads, in coordination with the Legal Department, are responsible for implementing further standards, guidelines and procedures that uphold this Policy, and for assigning day-to-day responsibilities for privacy protection to specific personnel for enforcement and monitoring.

5.2 Implementation. This Policy is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department, if required. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. OculusIT business units, functions or facilities will implement supplementary data privacy policies as required to be in compliance with applicable laws.

5.3 Interpretation. In the event of any conflict between this Policy and any supplemental data privacy policy, this Policy will supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Local data privacy policies may provide for stricter data privacy and

protection standards than are set forth in this Policy. In the event local data privacy law provides for stricter data privacy and protection than this Policy, the local data privacy law will supersede this Policy in that jurisdiction to the extent necessary to comply with stricter local law.

## 6 Definitions

“Agent” means any third party that collects and/or uses Personal Information provided by OculusIT to perform tasks on behalf of and under the instructions of OculusIT.

“OculusIT” is OculusIT LLC and all of its subsidiaries and affiliates globally.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.

“Human Resource Data” means Personal information concerning OculusIT employees or prospective employees.

An “Identified” or “Identifiable” individual is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person’s physical, physiological, mental, economic, cultural or social identity.

“Personal Information” is information or data about an “Identified” or “Identifiable” (see definition above) individual. It does not include information that is anonymous, aggregated or in circumstances where the individual is not readily identifiable.

“Policy” means this Global Data Privacy Policy, as revised.

“Processing” or “Process” means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.