



PRIVACY POLICY

Last Updated: July 2019

Vitech Systems Group and its affiliates, which you have a contract with or which provide services to you, (collectively or individually, as applicable, referred to as "Vitech", "Company", "we", "our", "us") respect your right to privacy. This Privacy Policy explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Privacy Policy is not a contract and does not create any legal rights or obligations. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Policy.

We may update this Privacy Policy from time to time in response to changing legal, technical, or business developments. When we update our Privacy Policy, the updated version will be posted on our website. If and where your consent is required by applicable data protection laws, we will obtain your consent to any material Privacy Policy changes.

What does Vitech do?

Vitech is one of the world's leading providers of financial and benefit administration software. We serve insurance, retirement and investment. Our software, V3®, is a unique administration platform specifically designed to address the unique needs of group benefits and alternative asset administration.

We are headquartered in New York City with staff and clients located across the United States and around the world. We provide the V3 software, implementation and support services and offer cloud-based solution hosting. We employ approximately 1,200 full time employees experienced in both enterprise software technology and the specific business domains in which we work. We are dedicated to helping our clients improve their market agility, raise their service levels and streamline their operations while consolidating and modernizing their legacy administration platforms.

For more information about Vitech, please see the "About" section of our website. [at www.vitechinc.com](http://www.vitechinc.com).

What personal information does Vitech collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

We may ask you to provide certain information voluntarily, such as your contact details, user credentials, and employment information. For instance, this can be by way of filling in an online form when you register to request to receive information from us, when you register to attend an event, when you provide us with your business card information or when you use our products and services. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information:

Billing information

Contact details including name, telephone numbers, email address, and postal address.

Why we collect it:

To maintain your account with us.

To respond to correspondence and enquiries you send us. In some cases, to gather information needed to provide products and services requested by you or your employer. To obtain your feedback regarding our products and services.

User credentials including name, email address, and personal information you provide to us in a profile.

To set up and maintain your user account. To monitor and enforce compliance with our contractual terms.

Employer and employment information such as job title, function, seniority, department, and the address / city / country of your office.

To manage your individual user account which is covered by a corporate account of one of Vitech's corporate customers, for instance, the corporate account of your employer.

Your preferences and interests, for instance which newsletters you would like to be subscribed to or what markets you are interested in.

To enable us to send you tailored information on our products and services across our companies that may be of interest to you.

Credit card numbers and bank account numbers. We refer to this type of personal data as "Sensitive Financial Data".

We do not collect sensitive personal information from our customers.

Information that we collect automatically

We may also collect certain information automatically from your device, including information regarding your use patterns of our products and services. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), "click stream" data and other technical information. We also collect information about how your device has interacted with our websites and products, including the pages and products accessed, and links clicked.

Collecting this information enables us to better understand the visitors who come to our website and the users of our products and services, where they come from, and what content on our website and products and services is of interest to them. We use this information:

- *for our analytics purposes;*
- *to improve the quality and relevance to users, of our websites and products and services;*
- *to develop and update our websites and products and services;*
- *for customer services purposes, for instance, reviewing our customers' training needs in respect of the use of our products;*
- *to satisfy Vitech's corporate customers' requests regarding the use of our products and services by the individual users licensed by their corporate account (please note that such information in many instances and jurisdictions will be offered to clients in an aggregated form); note that customers may be required by law to request such information from Vitech;*
- *to send you tailored information on our products and services that we believe may be of interest or value to you and also marketing and promotional e-mails with your consent if and when required by applicable law;*
- *on rare occasions to identify unauthorized use or unauthorized distribution of our products and services related or unrelated to a security issue;*
- *where relevant, to review and / or update our pricing model agreed with our corporate customers; and*
- *and for billing purposes, so that we are able to bill for the services provided.*

Some of this information may be collected using cookies and similar tracking technology. We use cookies and similar tracking technology (collectively, "Cookies") to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including your employer or business partner if you use Vitech's products covered by their corporate subscription), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from your employer (if you use Vitech products under your employer's corporate contracts and support agreements) consists of your contact details and employment information.

The types of information we collect from other third parties include information regarding you as a marketing prospect. For example, we may collect personal information from marketing vendors, social media sources, third party conferences, and other sources to the extent permitted by applicable law. We use the information we receive from these third parties to market our products and services across our lines of business to you, to supplement personal information we have for purposes such as maintaining and correcting our records, adding supplemental data fields, and similar reasons to enhance the delivery of our products and services to you.

Who does Vitech share my personal information with?

We may disclose your personal information to the following categories of recipients:

- ***Our Group Companies.*** We provide personal information to our related group companies who process personal information for purposes in line to those described in this Privacy Policy or notified to you when we collect your personal information.
- ***Third Party Service Providers.*** We provide personal information to third party service providers who provide data processing services to us. We do not sell your usage data to third parties for the purposes of their marketing third party products or services to you.
- ***For Business Transaction or Reorganization Purposes.*** We may take part in or be involved with a corporate business transaction, such as a merger, acquisition, joint venture, or financing or sale of company assets. We may disclose personal information to a third party during negotiation of, in connection with or as an asset in such a corporate business transaction. Personal information may also be disclosed in the event of insolvency, bankruptcy, or receivership.
- ***Law Enforcement Bodies and Legal Obligations.*** We may disclose personal information to third parties, such as law enforcement and legal advisors:
 - in connection with the establishment, exercise, or defense of legal claims;
 - to comply with laws or to respond to lawful requests and legal process;
 - to protect the rights and property of us, our agents, customers, and others, including to enforce our agreements, policies, and terms of use;
 - to detect, suppress, or prevent fraud;
 - to reduce credit risk and collect debts owed to us; or
 - to protect the health and safety of us, our customers, or any person.
- ***Other Persons, with Your Consent.*** We may disclose personal information about you to certain other third parties with your consent.

Please be aware that if you disclose personal information on website message boards or chat areas, that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond the control of Vitech.

What is the legal basis for processing personal information? (EEA visitors / users only)

The legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. As a general rule, we will only collect personal information from you where we have your consent to do so, where we need the personal information to perform a contract with you (for instance, your subscription to one of our products), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for instance, where we process personal data regarding the usage of our products and services, as described above). In some cases, we may also have a legal obligation to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to provide our products and services and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our products and services, advising you of product features or new releases, informing you of product maintenance, or undertaking marketing activities. We may have other legitimate interests and if appropriate it will be clear to you at the relevant time regarding what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

How does Vitech keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

Will my personal information be transferred?

Your personal information may be transferred to, and processed in, countries other than the country in which you reside. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective). Specifically, our servers are currently located in the US and Ireland, which may not be the country where we collected the data. Additionally, we have support operations in India.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

You may request our Standard Contractual Clauses by contacting privacy@vitechinc.com. We have implemented appropriate safeguards with our third-party service providers and further details can be provided upon request.

How long do you retain my data?

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, as set forth in our information governance procedures, or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we follow our information governance procedures and either delete or anonymize your personal information, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

What are my data protection rights?

Your rights include the right to access, correct, update or request deletion of your personal information. You also have the right to withdraw the consent you have provided to us. You have the following data protection rights:

- *to access, correct, update or request deletion of your personal information.*
- *you can object to processing of your personal information, ask us to restrict processing of your personal information, or request portability of your personal information.*
- *to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.*
- *if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.*
- *to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.*

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

How can I contact you about this Privacy Policy?

If you have any questions or concerns about our use of your personal information, please contact our Chief Privacy Officer at privacy@vitechinc.com or Chief Privacy Officer, Vitech Systems Group, 401 Park Ave South, New York, NY 10016.



COOKIE NOTICE

This Cookie Notice applies to Vitech Systems Group and its affiliates, which you have a contract with, or which provide services to you, (collectively or individually, as applicable, referred to as "Vitech", "Company", "we", "our", "us") and our website at www.vitechinc.com ("Website"). This Cookie Notice explains how we use cookies and similar technologies to recognize you when you visit our website. It explains what these technologies are and why we use them, as well as your rights to control our use of them.

What are cookies?

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (in this case, Vitech) are called "first party cookies". Cookies set by parties other than the website owner are called "third party cookies". Third party cookies enable third party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

Why do we use cookies?

We use first party and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Website to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Website. Third parties serve cookies through our Website for advertising, analytics and other purposes. This is described in more detail below.

The specific types of first and third-party cookies served through our Website and the purposes they perform are described below (please note that the specific cookies served may vary depending on the specific Website you visit):

What about other tracking technologies, like web beacons?

Cookies are not the only way to recognize or track visitors to a website. We may use other, similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphics files that contain a unique identifier that enable us to recognize when someone has visited our Website or opened an e-mail that we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our Website to another, to deliver or communicate with cookies, to understand whether you have come to our Website from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of e-mail marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their functioning.

Do you use Flash cookies or Local Shared Objects?

Our Website may also use so-called "Flash Cookies" (also known as Local Shared Objects or "LSOs") to, among other things, collect and store information about your use of our services, fraud prevention, and for other site operations.

If you do not want Flash Cookies stored on your computer, you can adjust the settings of your Flash player to block Flash Cookies storage using the tools contained in the Website Storage Settings Panel. You can also control Flash Cookies by going to the Global Storage Settings Panel and following the instructions (which may include instructions that explain, for example, how to delete existing Flash Cookies (referred to "information" on the Macromedia site), how to prevent Flash LSOs from being placed on your computer without your being asked, and (for Flash Player 8 and later) how to block Flash Cookies that are not being delivered by the operator of the page you are on at the time).

Please note that setting the Flash Player to restrict or limit acceptance of Flash Cookies may reduce or impede the functionality of some Flash applications, including, potentially, Flash applications used in connection with our services or online content.

Do you serve targeted advertising?

Third parties may serve cookies on your computer or mobile device to serve advertising through our Website. These companies may use information about your visits to this and other websites in order to provide relevant advertisements about goods and services that you may be interested in. They may also employ technology that is used to measure the effectiveness of advertisements. This can be accomplished by them using cookies or web beacons to collect information about your visits to this and other sites in order to provide relevant advertisements about goods and services of potential interest to you. The information collected through this process does not enable us or them to identify your name, contact details, or other personally identifying details unless you choose to provide these.

How can I control cookies?

You have the right to decide whether to accept or reject cookies. You can set or amend your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our Website may be restricted. To learn how to manage your cookies, please follow the instructions from your specific browser.

If you are visiting this site using a mobile device such as a smartphone or tablet, please refer to the manufacturer's instructions on how to manage cookies.

In addition, most advertising networks offer you a way to opt out of targeted advertising. If you would like to find out more information, please visit <http://www.aboutads.info/choices/> or <http://www.youronlinechoices.com>.

How often will you update this Cookie Notice?

We may update this Cookie Notice from time to time in order to reflect, for example, changes to the cookies we use or for other operational, legal or regulatory reasons. Please therefore re-visit this Cookie Notice regularly to stay informed about our use of cookies and related technologies.

The date at the top of this Cookie Notice indicates when it was last updated.

Where can I get further information?

If you have any questions about our use of cookies or other technologies, please contact our Chief Privacy Officer at privacy@vitechinc.com or Chief Privacy Officer, Vitech Systems Group, 401 Park Ave South, New York, NY 10016.