

PRIVACY POLICY

1. POLICY STATEMENT

NEDAS and its affiliated companies (“We”, “Us”) are strongly committed to protecting the privacy of all personal information and providing a safe and secure environment for its subscribers, contributors, program and event attendees and other users of its services and websites. This Privacy Policy (the “Policy”) describes how NEDAS collects, uses, and discloses any Personal Information that you entrust to NEDAS when you contract for the use of its products or services, participate in our programs and events, or use any of its websites (collectively, the “Services”). This Policy does not govern personal information of NEDAS’s employees, independent contractors, vendors and clients, which are subject to separate agreements or policies.

PLEASE NOTE THAT BY USING NEDAS’S SERVICES OR VISITING ITS WEBSITES, YOU SIGNIFY YOUR AGREEMENT WITH THIS POLICY. IF YOU DO NOT AGREE TO THE TERMS OF THIS POLICY, PLEASE DO NOT USE THE SERVICES AND/OR REFRAIN FROM VISITING THE WEBSITES.

2 COLLECTION OF PERSONAL INFORMATION

NEDAS does not collect Personal Information in the course of providing Services or on our website unless authorized or requested by the user to do so.

For purposes of this Policy, “Personal Information” shall mean any information relating to an identified or identifiable natural person and refers to any information that identifies, directly or indirectly, or that can be used to identify, contact, or locate the person to whom such information pertains. Examples of Personal Information include name, address, email address, telephone number, social security number, and computer IP address, amongst others.

3 USE OF PERSONAL INFORMATION

NEDAS may use or disclose your Personal Information for the following purposes:

- Support services requests and record keeping;

- Databases of contact information to be used solely for internal NEDAS purposes;
- Improvements in our Services;
- Promotional emails which we think you may find interesting using the email address which you have provided. You have the right to opt out of these messages;

Your Personal Information will never be sold or disclosed to third parties for any other use or purpose except as set forth above unless you have specifically authorized such use.

4 OPT-OUT

You have an opportunity to opt out of NEDAS's collection of Personal Information where (i) NEDAS discloses your information to a third party, or (ii) where information will be used in a manner materially different from that which it was originally collected. NEDAS will not provide an opt-out option when disclosure is made to a third party that is acting as an agent to perform task(s) on behalf of NEDAS. NEDAS shall always enter into a contract with such agent to protect the confidentiality and security of your Personal Information, as more thoroughly described below.

If you wish to opt-out of NEDAS's collection of your Personal Information, please reach out to the Privacy Officer listed in Section 12 below. Should you request access to, opt-out of, or revoke your consent (as more specifically described below) to our collection of Personal Information, NEDAS may request that you provide certain information in order to confirm your identity with respect to the request. Please allow NEDAS a reasonable amount of time to comply with your request and for such request to take effect.

5 DISCLOSURE OF PERSONAL INFORMATION

5.1 THIRD PARTIES

In order to provide the Services, NEDAS may share your Personal Information and/or aggregate information with technical consultants, third party auditors, and other third party service providers. All such third parties may access, process, or store Personal Information in the course of providing their services. All such third party service providers have entered into agreements with NEDAS agreeing to respect and maintain the safety

and security of all Personal Information they may receive and are bound by the same or equally stringent terms as set forth herein. NEDAS discloses only that information it believes in its reasonable discretion is necessary for the third party to carry out its obligations to NEDAS.

5.2 COMPELLED DISCLOSURES

Notwithstanding any protections to Personal Information herein, NEDAS may disclose Personal Information if disclosure is required by (i) a valid and lawful order of a court or other governmental or public body having jurisdiction, or (ii) to meet national security or law enforcement requirements. NEDAS will endeavor to use reasonable efforts to disclose only that which is required to comply with the request.

6 INFORMATION SECURITY

We are committed to ensuring that your Personal Information is secure. In order to prevent misuse, unauthorized access or disclosure, alteration and/or destruction, we have put in place suitable physical, logical and managerial procedures to safeguard and secure the information we collect.

In the event of any unauthorized access or disclosure of your information, NEDAS will endeavor to promptly notify you of any such unauthorized access or disclosure and to take reasonable steps to ameliorate such unauthorized access or disclosure.

7 INFORMATION STORAGE

The length of time NEDAS may store your information may vary depending on our use of the Personal Information. NEDAS represents that unless otherwise required by law, we will not maintain your information for longer than is reasonably necessary for the purposes for which information was collected.

8 USE OF OUR WEBSITE

8.1 COOKIES

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you

know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. We use traffic log cookies to identify which pages are being used. This helps I analyze data about webpage traffic and improve its websites in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Cookies help us provide you with a better website experience, by enabling NEDAS to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify your browser setting to decline cookies if you prefer. Declining cookies may prevent you from taking full advantage of the website.

8.2 LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, we do not have any control over external websites. External sites are not governed by this Policy. Therefore, we will not be responsible for the protection and privacy of any information which you provide when visiting such other sites. You should exercise caution and read the privacy statement applicable to the website in question.

9 CONTROLLING YOUR PERSONAL INFORMATION

9.1 RIGHT OF ACCESS/UPDATING PERSONAL INFORMATION

At any time during the provision of the Services and to the extent NEDAS stores Personal Information, you may notify NEDAS in writing of your request to:

- (i) obtain confirmation as to whether or not NEDAS stores any Personal Information related to you; or
- (ii) obtain access to such Personal Information so that you may verify its accuracy; or

Upon reasonable request, NEDAS shall provide you with access to your Personal Information, provided, however, that NEDAS may, in limited circumstances, deny access to your Personal Information.

Should you request deletion of any Personal Information, keep in mind there may be residual information that will remain within NEDAS databases, access logs, proprietary software programs and other records, which may or may not contain Personal Information. NEDAS will maintain the confidentiality of such remaining information to the extent it cannot permanently delete it from its systems. NEDAS is not responsible for updating or removing any information contained in third party lists or databases.

9.2 REVOCATION

If you have previously agreed to us using your Personal Information for direct marketing purposes, you may change your mind at any time by writing to us and we shall promptly remove you from our direct marketing programs.

NEDAS will not sell, distribute or lease your Personal Information to third parties unless we have your permission or are required by law to do so. NEDAS may use your Personal Information to send you promotional information that NEDAS thinks you may find interesting if you authorize NEDAS to send you such promotional material.

10 DISCLAIMER

Under no circumstance will NEDAS be liable for any information it merely transmits and does not collect from you during your use of the Services. Furthermore, except as required under applicable law, NEDAS shall not be responsible for the accuracy of any information you may submit during your use of the Services.

11 CHANGES IN THE POLICY

NEDAS reserves the right to change this Policy from time to time at its sole discretion. If as the result of such changes, you wish to alter the ways in which NEDAS is allowed to use your Personal Information, you can do so by following the procedure described in

Section 9.. You will be deemed to have been made aware of, and will be subject to, the changes to this Policy by your continued use of the relevant NEDAS Services.

12 PRIVACY-RELATED INQUIRIES

NEDAS takes the privacy of Personal information seriously. If you believe that NEDAS has not complied with this Policy with respect to your Personal Information or other information submitted to us, you may write directly to at privacy@imillerpr.com

You may also relay any other inquiries or concerns you may have pertaining to our above stated policies to our Customer Service Department to the same email address.

Effective Date: March 18, 2019