

NWN Corporation, its affiliates and subsidiaries (collectively “**NWN**,” “**we**,” “**our**” or “**us**”) knows you care about how your Personal Information is used and shared, and we take your privacy seriously. Please read the following to learn more about our AiVA Privacy Policy. By using or accessing AiVA (the “NWN Solution”) in any manner, you acknowledge that you accept the practices and policies outlined in this AiVA Privacy Policy, and you hereby consent that we may collect, use, and share your information in the ways detailed throughout this policy.

Changes to this Privacy Policy

NWN may make changes to this AiVA Privacy Policy without notice or consent from you so we encourage you to check back and review this AiVA Privacy Policy regularly. The most current version of the AiVA Privacy Policy will govern NWN’s use of information about you and will be located at nwn.ai/compliance.

This AiVA Privacy Policy explains:

1. The type of information we collect.
2. How NWN collects your information, including tracking and cookies.
3. How NWN uses your personal information.
4. How you can correct or update the information NWN has.
5. Consent to Commercial Electronic Messages.
6. Who we may share information with.
7. How we handle Do Not Track requests.
8. Linked sites and services.
9. Data security.
10. Retention of your information.
11. Notice of privacy rights to California residents.
12. Your right to be informed of appropriate safeguards where Personal Information is Transferred to a Third Country or to an International Organization; Notice of privacy rights to residents of the European Union Area
13. Our Policy with Respect to Children,
14. How to contact us.

1. The type of information we collect

NWN may collect information that you provide to NWN in connection with your use of the NWN Solution when you:

- Register your account as a user of the NWN Solution, including through registration as an employee, contractor or other user of the NWN Solution on behalf of an NWN customer or as an end user of an NWN customer ("**Customer**"),
- Make changes to your user profile information,
- Send email messages, forms, or other information to NWN or other users using the NWN Solution, or
- Install, use or otherwise interact with the NWN Solution.

This information may include your first and last name, your address, email address, telephone number, your location, and any additional information you provide to NWN during the account registration process or input into the NWN Solution.

NWN may also collect certain technical information about your use of the NWN Solution. This technical information may include technical information about your device(s), browser type and version, geo-location information, computer and connection information, statistics on page views, traffic to and from the NWN Solution, ad data, Wi-Fi connection information, internet protocol ("**IP**") address, and standard web log information.

Additionally, when expressing an interest in obtaining additional information about the NWN Solution or registering to use the NWN Solution, we, or a Customer, may require you to provide us with personal contact information, such as your name, company name, address, phone number, and email address ("**Required Information**"). We may also ask an actual or prospective Customer to provide additional information, such as company annual revenues, number of employees, or industry ("**Optional Information**"). Required Contact Information, Billing Information, and Optional Information about Customers are referred to collectively as "**Customer Data**."

2. How NWN Collects Your Information; Tracking and Cookies

When you register for an account with NWN either directly or through a Customer, or a third-party service provider, we may ask you to provide us with certain information to create your account, and to provide you with our NWN Solution. This information is collected by us when you fill out forms that may be provided to you through the NWN Solution.

NWN, and third parties we interact with, including our third-party service providers, may use cookies, web beacons, hashed identifiers derived from email addresses for the purposes of cross-device tracking for targeted advertising, local shared objects (sometimes called “flash cookies”), and similar technologies in connection with your use of the NWN Solution to provide and support the NWN Solution (collectively referred to in this policy as “Cookies”). Cookies are small data files that may have unique identifiers, and reside, among other places, on your mobile device, in emails we send to you, and on our applications. Locally shared objects or “flash cookies” are data files that can be created on your computer by the websites you visit and are a way for websites to store information for later use. Locally stored objects are different than cookies because they are stored in different parts of your computer than cookies. Web beacons are small strings of code that provide a method for delivering a graphic image on a web page or in an email message for the purpose of transferring data.

If Cookies are used, they may be used to collect information about you and your use of the NWN Solution, such as your browser type, preferences, data relating to content that has been displayed to you or that you have clicked on, and the date and time of your use. Cookies may also be used in order to further features and processes on the NWN Solution, provide authentication and security for your transactions using the NWN Solution, store your preferences, facilitate relevant advertising, and help us learn more about how users engage with the NWN Solution.

We sometimes use service providers to help us provide certain products and services or to integrate other features. These third-party providers may collect information when you view or use them, including information about you and your device or browser. They may do this using Cookies or similar technologies. These third-party providers also may use these technologies to help share information with us, like how you use their website or application. To learn more about the information they collect or receive, review their privacy policies.

As part of using our NWN Solution, NWN’s Customers may submit to NWN electronic data or information (“**Submitted Data**”) that constitutes personal information of other individuals. Such data may include an individual’s name, email address, phone number or any other data that the Customer chooses to submit to us. NWN generally has no direct relationship with the individuals to whom Submitted Data may pertain. NWN processes Submitted Data on behalf of our Customers and any uses of Customer Data by NWN are done so pursuant to this AiVA Privacy Policy or a separate agreement in place between NWN and the applicable Customer, which governs our treatment of Submitted Data.

NWN requires express consent for the collection of Personal Information and, to the extent you provide your data directly to NWN, you consent to NWN’s collection, retention and use of that data pursuant to the terms of this AiVA Privacy Policy. For Personal Information and data collected as part of Submitted Data, NWN requires its Customers to similarly obtain express consent for the collection, retention and

use of that data by NWN pursuant to the terms of the relevant agreement between NWN and the relevant Customer.

3. How NWN Uses Your Information

NWN may use your information to:

- Provide access to the NWN Solution to communicate with you,
- Personalize, customize, measure, and improve NWN's products, services, content, and advertising,
- Prevent, detect, and investigate potentially prohibited or illegal activities or a breach of the applicable agreement(s) between you and NWN,
- Analyze the accuracy, effectiveness, usability, or popularity of the NWN Solution
- Generate and review reports and data about NWN's user base and NWN Solution usage patterns,
- Compile aggregate data for internal and external business purposes,
- Resolve disputes and troubleshoot problems, and
- Contact you with information, including promotional, marketing, and advertising information and recommendations that NWN believes may be of interest to you.

Consistent with applicable laws, including United States CAN-SPAM laws, if you do not wish to receive commercial emails, you may unsubscribe following the instructions on any email. We may still send you administrative notices, however.

We endeavor to protect the privacy of your account and other Personal Information we hold in our records, but unfortunately, we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. In particular, you acknowledge that NWN is not responsible for any loss of any passwords or login information which you receive for access to the NWN Solution which results from your failure to keep that information secure. The lawful basis for NWN's use and retention of Submitted Data information collected by NWN is NWN's legitimate business interest. NWN also requires each of its Customers to ensure that their Customer has a legitimate basis to provide the Submitted Data to NWN for use in the NWN Solution.

4. Correcting and Updating Your Information

Please access and complete the [Data Subject Access Request](#) form to exercise any of the rights stated in this section.

You have the right to revoke your consent to the collection, processing and use of your Personal Information.

You have the right to request access to any Personal Information which NWN may have about you. The information will be provided in a machine-readable format. You may also ask that we transfer the Personal Information to a third party, which we will do if technically feasible.

You have the right to review, add and update your Personal Information.

You also have the right to object or restrict processing of your Personal Information.

You may also request the deletion of your Personal Information, where:

- the information is no longer necessary in relation to the purposes for which it was collected or otherwise processed,
- you withdraw consent to NWN's possession of the information on which the processing is based and where there is no other legal ground for NWN's retention of the information,
- you object to NWN's possession of the information and there is no overriding legitimate basis for the retention,
- the personal information has been unlawfully obtained or processed, or
- the personal information has to be erased for compliance with a legal obligation in the European Union or other law to which NWN is subject.

When you update information, however, we may maintain a copy of the unrevised information in our records. Some information may remain in our records after your deletion of such information from your account. We may use any aggregated data derived from or incorporating your Personal Information after you update or delete it, but not in a manner that would identify you personally.

You may contact NWN with regard to the collection, processing and use of your Personal Information as set forth in this Section but keep in mind some information may be needed to take advantage of product features or may be required by your relationship with NWN.

If you are dissatisfied with how your data subject access request was handled, you have the right to lodge a complaint with your respective Supervisory Authority. A list of Supervisory Authorities can be found by referencing the following link: https://edpb.europa.eu/about-edpb/about-edpb/members_en#member-at

5. Consent to Commercial Electronic Messages

If you provide us with an email address, you expressly consent to receiving Commercial Electronic Messages from NWN about your use of the NWN Solution. If you have any questions about NWN's Commercial Electronic Messages, you can contact NWN at:

NWN Corporation
659 South County Trail
Exeter, RI 02822 Attention: Privacy Officer

or

by emailing privacy@nwn.ai

In addition, you may opt out of receiving Commercial Electronic Messages at any time by emailing privacy@NWN.ai.

6. Who We May Share Information With

NWN may disclose the information we collect from you to the following third parties:

Users of the NWN Solution; Public Information. When you share information with us via the NWN Solution, NWN may share your information to other users, in accordance with the privacy settings you or the respective Customer has chosen for your account or that are applicable to that information. To the extent you share any information to a public audience or via a publicly accessible portion of the NWN Solution such as an online Customer community or forum, that information may be available to anyone who has access to that Customer community or forum.

NWN's Solution Providers. NWN may share your information with third-party contractors, agents, collaborators, or service providers who provide certain services to NWN or on NWN's behalf, such as operating and supporting the NWN Solution. NWN may also request your information from a previous service provider, which we need to provide our services to you. Alternatively, NWN may pass on your information to a service provider that NWN Customers have chosen to replace NWN.

Companies that Acquire NWN's Business or Assets. If NWN becomes involved in a merger, acquisition, sale of assets, securities offering, bankruptcy, reorganization, or dissolution or if the ownership of all or substantially all of NWN's business relating to the NWN Solution otherwise changes, NWN may provide your information to a third party or parties in connection with the applicable transaction.

NWN's Affiliates. NWN may share some or all of your information with NWN's parent company, subsidiaries and corporate affiliates, joint ventures or other companies under common control with NWN.

NWN Customers. If NWN has received your information as part of Submitted Data, NWN may share that information, or any modifications or revisions to that information with that Customer.

Switching NWN Solution Providers. NWN may request your information from your previous service provider, which we need to provide our services to you. Alternatively, NWN may pass on your information to a service provider that you have chosen to replace NWN.

Aggregate Information. NWN may share information relating to our visitors and users with affiliated or unaffiliated third parties on an aggregate basis, however this information will not identify you personally.

Legal Requirements. NWN may share your information with law enforcement, governmental agencies, or authorized third parties, in response to a request relating to a criminal investigation or alleged illegal activity or any other activity that may expose NWN, you, or any other NWN user to legal liability, or to protect NWN's rights or property, or during emergencies when safety is at risk. NWN may also share your information in response to court orders, subpoenas, or other legal or regulatory requests, and NWN may provide access to your information to NWN's legal counsel and other consultants in connection with actual or potential litigation. NWN shall remain liable under if its agent processes such personal information in a manner inconsistent with the AiVA Privacy Policy, unless NWN proves that it is not responsible for the event giving rise to the damage.

7. How We Handle “Do Not Track” Requests

You may be able to adjust your browser settings or other settings so that “do not track” requests are sent to our websites and mobile applications. NWN does not use any tracking technology that would respond to any “do not track” requests that are sent to our services. NWN does not collect personally identifiable information about your online activities over time and across different websites when you use the NWN Solution; however, certain service providers that use Cookies may collect your personally identifiable information over time and across different websites.

8. Linked Sites and NWN Solution

NWN's website or application may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

9. Data Security

NWN, through its service provider partners, takes reasonable measures to protect the information you provide to NWN or submit through the NWN Solution against misuse, loss, theft, unauthorized use, disclosure, or modification. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk and your

information may be disclosed to third parties in unforeseeable situations or situations that are not preventable even when commercially reasonable protections are employed. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

10. Retention of Your Information

In relation to Submitted Data, Customers are provided the option to define and configure a Personal Information retention period. This can be systematically accomplished directly in the service. Once the retention period is met, personal information is redacted. If a retention period is not configured, Personal Information is retained for only as long as necessary and relevant for NWN's operations, and for NWN's Customers to work with their consumers. In relation to NWN organizational data, Personal Information, will be retained as long as necessary and relevant for NWN's operations.

NWN may also retain information collected from you to comply with the law, prevent fraud, resolve disputes, troubleshoot problems, assist with any investigation, and take other actions permitted by law or disclosed in this AiVA Privacy Policy.

11. Notice of Privacy Rights to California Residents

Specific disclosures for California residents as required by the California Consumer Privacy Act and the California Privacy Rights and Enforcement Act are set out in the Schedule below titled "CALIFORNIA RESIDENTS – CCPA".

12. Right to be informed of appropriate safeguards where Personal Information is Transferred to a Third Country or to an International Organization; Notice of Privacy Rights to Residents of the European Economic Area

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by completing the [Privacy Request Form](#) or by contacting us at privacy@nwn.ai.

13. Our Policy with Respect to Children

Our Services are not directed to children under 13 and we do not knowingly collect PII from children under 13. If we learn we have collected PII of a child under 13, we will delete such information from our files as soon as possible.

14. How to Contact Us

If you have questions or complaints regarding NWN 's Privacy Policy or practices, please contact privacy@nwn.ai or via postal mail at

NWN Corporation

659 South County Trail

Exeter, RI 02822 Attention: Privacy Officer.

CALIFORNIA RESIDENTS – CCPA

This section contains disclosures required by the California Consumer Privacy Act (“CCPA”) and applies only to “personal information” of California residents that is subject to the CCPA.

We collect, use, share and sell the categories of personal information about California consumers as set out in the table below.

CCPA category reference	Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information may be collected:	Business or commercial purposes for collection, use, and sharing:	May be disclosed for business purposes to the following categories of third parties:	May be sold to the following categories of third parties:
A.	Personal and online identifiers (such as first and last name, email address, or unique online identifiers)	Yes	From users, corporate Customers and third party data vendors	Website improvement, user authentication, security, provision of NWN Solution and Website services, marketing,	Service providers and NWN Customers	None
B.	Categories of information described in Section 1798.80 of the California Civil Code (such as name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories)	No	N/A	N/A	N/A	N/A

CCPA category reference	Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information may be collected:	Business or commercial purposes for collection, use, and sharing:	May be disclosed for business purposes to the following categories of third parties:	May be sold to the following categories of third parties:
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Yes	From users, and NWN Customers	Provision of the NWN Solution to NWN Customers	NWN Customers	None
D. Commercial information.	Commercial or transactions information (such as records of personal property or products or services purchased, obtained or considered)	No	N/A	N/A	N/A	N/A
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	No	N/A	N/A	N/A	N/A

CCPA category reference	Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information may be collected:	Business or commercial purposes for collection, use, and sharing:	May be disclosed for business purposes to the following categories of third parties:	May be sold to the following categories of third parties:
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Directly from users and from third party data vendors	Analytics and NWN Solution and Website improvement, user authentication, security, provision of NWN Solution and Website services, marketing	Service providers and NWN Customers	None
G. Geolocation data.	Physical location or movements.	Yes	Directly from user.	Analytics and NWN Solution and Website improvement, user authentication, security, provision of NWN Solution and Website services, marketing	Service providers and NWN Customers	None
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No	N/A	N/A	N/A	N/A

I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes	NWN Customers	NWN Solution improvement, user authentication, security, provision of NWN Solution	NWN Customers	None
CCPA category reference	Categories of Personal Information	Collected in the last 12 months:	Categories of sources from which information may be collected:	Business or commercial purposes for collection, use, and sharing:	May be disclosed for business purposes to the following categories of third parties:	May be sold to the following categories of third parties:
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No	N/A	N/A	N/A	N/A
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, <u>abilities and aptitudes.</u>	Yes	Directly from users, from vendors of analytics services and from third party data <u>vendors</u>	Analytics and NWN Solution and Website improvement, marketing	Service providers and NWN Customers	None

Business and commercial purposes

The business and commercial purposes set out above are described in more detail in the section entitled "HOW WE USE YOUR PERSONAL INFORMATION"

Exercising your CCPA rights

Requests for Deletion, Right to Know, and Do Not Sell. Subject to certain exceptions, California consumers have the right to make the following requests, at no charge:

Deletion: the right to request deletion of the personal information that we have collected about you, subject to certain exemptions (such as where the information is used by us to detect security incidents, debugging or to comply with a legal obligation).

Right to Know: the right to request (not more often than twice a year) that we disclose certain information about how we have handled your personal information in the prior 12 months, including the:

- categories of personal information collected
- specific pieces of personal information collected
- categories of sources of personal information
- the purposes for which we use the personal information
- categories of third parties with whom we have shared your personal information
- categories of personal information that we have disclosed or sold to a third party

Do Not Sell: the right to request, absent an exception, that we stop selling your personal information ("opt-out") except where you later provide authorization for us to do so. We will wait at least 12 months before asking you to opt back into the sale of your personal information.

Non-Discrimination. We will not discriminate against you for exercising any of your CCPA rights. However, many features of our Site and Services will not function without your personal information. Unless permitted by the CCPA, we will not deny you products or services, charge you a different price, or provide a different level or quality of products or services just because you exercised your rights under the CCPA.

Submitting Requests. You can exercise your CCPA rights by submitting a request to our data privacy team at privacy@NWN.ai. You can also exercise the right at any time by completing the [Data Subject Access Request Form](#). We will respond to all CCPA requests within the period of time set out by the regulation..

Verification. When you submit your request, we will take steps to verify your identity. We will seek to match the information in your request to the personal information we maintain about you. We will only complete your request where we are satisfied that we have verified your identity to a reasonably degree of certainty.

Authorized Agents. To the extent the CCPA allows California consumers to designate an authorized agent to exercise their rights under the CCPA, you must provide a signed authorization directing such agent to act on your behalf as part of your access request.

Your California Privacy Rights under California’s Shine-the-Light Law Under California’s “Shine the Light” law (Cal. Civ. Code § 1798.83), California residents who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year pertaining to any relevant third-party sharing in the prior calendar year. If you are a current California resident, you may make a Request by attesting to the fact that you are a California resident and providing a current California address in the Request Details section of the form.