

Personal Data Protection Policy

1. Policy Statement

LightEdge Solutions, Inc. ("LightEdge") respects the privacy of the personal data entrusted to us by our customers and we are committed to protecting its privacy and confidentiality and providing data security through our compliance with the European Union's privacy regulation, General Data Protection Regulation ("GDPR"), and its imposed rules, as further outlined in this Personal Data Protection Policy ("Policy").

2. Scope

This policy describes the personally identifiable information of data we may collect from you or that you may provide to us and outlines our security practices for processing, storing, and protecting the privacy and confidentiality of that information.

This Policy applies to personal data provided to LightEdge or its service providers or collected by LightEdge or its service providers from or about our prospective or current customers ("Customer") using LightEdge hosting and information technology services, including, but not limited to, communication, data center and cloud-based data storage, business and consumer continuity services, IT management, and technology consulting services ("Services"), as described in the Customer Service Agreements.

"Personal Data" means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to a name, an identification number, locational data, online identifier, or to one or more factors specific to his or her physical, physiological, mental, economic, cultural or social identity, or is defined as Personal Data by law.

"Process" or "Processing" means any operation or set of operations that is performed upon Personal Data, whether or not by automatic means, such as collection, accessing, recording, transferring, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

"Data Subjects", "Data Controller" and "Data Processor" have the meanings given to them under the applicable Data Protection laws.

3. Data Protection

For the purposes of providing Services to Customer, LightEdge may Process information obtained or received from Customer that may constitute Personal Data under applicable privacy and data protection statutes, rules, ordinances, laws and regulations in the performance of the Services ("Data Protection Laws"). As Data Controller, LightEdge is responsible for Processing Personal Data in compliance with the requirements of the applicable Data Protection Laws, including provisions on data disclosure, transparency, rights of data subjects, data processors, data security, and international data transfers.

LightEdge will treat and maintain Personal Data with confidentiality and Process the minimum amount of Personal Data only as to the extent and in such a manner as it is necessary to provide Services under the Customer Service Agreement or as otherwise instructed by Customer. LightEdge will keep and retain Personal Data for no longer than is necessary for the completion of the Services and, when it is no longer needed for the completion of the Services, securely destroy it so that such data is no longer available, accessible, or recoverable by any known means.

LightEdge will provide transparency to Data Subjects concerning its data Processing and provide all information as required by the Data Protection Laws. All Personal Data will be processed in accordance with the LightEdge Privacy Statement set forth at <http://www.lightedge.com/legal>. We are committed to responding to individuals exercising data protection rights available to them under the applicable Data Protection Laws, including the rights of access, rectification, erasure, portability, and objection to the Processing of Personal Data by LightEdge.

LightEdge service providers authorized to Process Personal Data are required to respect and maintain the confidentiality and security of the Personal Data and must comply with this Policy and the applicable requirements set by the Data Protection Laws.

4. Providing Personal Data to Customer

LightEdge may provide or disclose necessary Personal Data to Customer in connection with the Services that LightEdge collects or obtains by providing all the necessary information to the Data Subjects and obtaining all the necessary consents and authorizations for the Processing.

5. Information Security

LightEdge employees, agents, or other representatives are required to use commercially reasonable efforts designed to ensure the confidentiality, integrity, security, and availability of Personal Data. LightEdge will maintain appropriate technical and organizational measures designed to protect Personal Data against accidents or unlawful destruction or accidental loss, alteration, unauthorized disclosure, access, or use, and other unauthorized Processing. LightEdge will not disclose or transfer Personal Data without ensuring that adequate protections and safeguards are in place to protect Personal Data. LightEdge takes reasonable steps to ensure compliance with information security requirements and obligations set by the applicable Data Protection Laws.

LightEdge will investigate any actual, probable, or reasonably suspected breach of security or unauthorized Processing. If based on our investigation, we know or reasonably believe a breach has occurred, LightEdge will inform individual Data Subjects of such breaches in accordance with the requirements of the applicable Data Protection Laws. LightEdge will notify Customer of any communication of Personal Data or security breach that may have resulted in the compromise of Personal Data to the individuals concerned.