

Systema Privacy Policy

Revision Date: January 1, 2024

Protecting your privacy is a commitment for Systema America Inc. ("Systema"). This Privacy Policy (the "Policy") describes how we collect, share, and secure your Personal Information, including information provided by you through <https://www.systema.us> ("website"). This Policy explains our practices in relation to our business regarding your Personal Information, including how we collect, use, and share your Personal Information, and your rights regarding the Personal Information we collect.

By visiting our website or submitting information, you agree to let us collect and use your personal information as described in this Privacy Policy. Therefore, before you provide us with any personal information, you should read through this Privacy Policy in its entirety and understand its terms. We may update the Policy from time to time, so please check it occasionally.

This Policy describes:

- Personal Information We Collect;
- How We Collect Your Personal Information;
- How We Use Your Personal Information;
- How We Share Your Personal Information With Third Parties;
- How We Protect Your Personal Information;
- Ability to Access, Update and Correct Personal Information;
- California Privacy Rights
- Changes to the Policy;
- Questions About This Policy.

PERSONAL INFORMATION WE COLLECT AND WE HAVE COLLECTED IN THE PRECEDING 12 MONTHS

Systema may collect or have collected in the preceding 12 months information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household ("Personal Information"). Systema may also collect non-Personal Information that cannot be linked or associated with any individual person or household. When non-Personal Information is combined with other information so that it does identify an individual person, we treat that combination as Personal Information. We may collect, use, store and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- **Contact Information** such as name, company, job title, email address(es) and telephone numbers.
- **Sensory Data** such as voice data recorded at a meeting.

Systema has obtained the categories of personal information listed above from the following sources in the preceding 12 months.

- **Directly from you:** For example, emails from you, exchange of business cards with you, communication at meetings, etc.
- **From the service provider:** For example, Systema may receive information about individuals who may be interested in our services from third-party service providers.

Children’s Privacy. The website is intended for adult use only and is not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Information, the parent or guardian of that child should contact us at the email address below and to have this Personal Information deleted from our files.

sai-ga@systema.us

HOW WE COLLECT YOUR PERSONAL INFORMATION

Information You Provide To Us: Systema may collect Personal Information from you that you voluntarily provide to us in various ways, including, but not limited to communicate with us or otherwise interact with the website.

Your ‘Do Not Track’ Browser Setting. Some web browsers incorporate a Do Not Track (“DNT”) feature that signals to the websites that you visit that you do not want to have your online activity tracked. At this time, our website does not respond to DNT signals. Other third-party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

HOW WE USE YOUR PERSONAL INFORMATION

How We Use Your Personal Information

We will only use your Personal Information when the law allows us. Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to provide services to you.
- Where we analyze visitors of website for marketing.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Purposes For Which We May Use and We Have Used in the Preceding 12 Months Your Personal Information

We may use or have used in the preceding 12 months your collected information to respond to your inquiries, resolve disputes, troubleshoot problems, improve our site, marketing, and enforce the terms of our policies.

HOW WE DISCLOSE AND HAVE DISCLOSED IN THE PRECEDING 12 MONTHS YOUR PERSONAL INFORMATION WITH THIRD PARTIES

We may share or have disclosed in the preceding 12 months your Personal Information with third parties only in the ways that are described in this Policy.

Service Providers. We may use third party service providers to perform certain business services and may disclose Personal Information to such service providers as needed for them to perform these business services. Service providers are only allowed to use, disclose, or retain the Personal Information to provide these services and are prohibited from selling Personal Information.

Internal Third Parties. We may share Personal Information with our parent company, subsidiaries, successors, assigns, licensees, affiliates, or business partners and others, including where disclosure of your Personal Information is needed to protect the employees, independent contractors, officers, directors, members, users, or shareholders of Systema who may use the Personal Information for the purposes described above.

Business Transactions. We may do business with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your Personal Information in the same way as set out in this Policy.

Legal Process. Subject to applicable law, we may disclose information about you (i) if we are required to do so by law, regulation, or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent physical, financial, or other harm, injury, or loss; or (iv) in connection with an investigation of suspected or actual unlawful activity.

No Sales or Sharing of Personal Information. We do not sell or share your personal information for advertising.

PERSONAL INFORMATION WE HAVE DISCLOSED AND TO WHOM IN THE PRECEDING 12 MONTHS

We have not disclosed your Personal Information in the preceding 12 months.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We have implemented and maintain generally accepted industry standards to protect against the unauthorized access, use, modification, destruction, or disclosure of your Personal Information both during transmission and once we receive it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure.

ABILITY TO ACCESS, UPDATE AND CORRECT PERSONAL INFORMATION

Systema wants your Personal Information to be complete and accurate. You represent and warrant that all information you provide in connection with your use of the website will be complete and accurate, and that you will update that information as necessary to maintain its completeness and accuracy. To confirm the completeness and accuracy of, or make changes to, your Personal Information, please contact us at sai-ga@systema.us or by changing your profile settings on our website.

Systema will not retain your Personal Information for longer than is reasonably necessary for the purposes for which it is used or as required by law.

CALIFORNIA PRIVACY RIGHTS

California Consumer Privacy Act. The California Consumer Privacy Act of 2018 (“CCPA”) provides California residents with specific rights regarding their Personal Information. This section describes your CCPA rights and explains how to exercise those rights.

Upon verification of your identity you may:

- No more than twice in any 12-month period, request disclosure of the following information:
 - Categories of Personal Information we collect.
 - Categories of sources from which Personal Information is collected.
 - Categories of Personal Information sold to or shared with third parties.
 - Categories of third parties with whom such Personal Information is sold, shared or disclosed.
 - Business or commercial purpose for collecting, sharing or selling Personal Information.
 - Specific pieces of Personal Information we collect.

- Request correction of inaccurate Personal Information.
- Request deletion of your Personal Information, subject to the exceptions provided by law.
- Opt-out from having your Personal Information sold to or shared with third parties, if applicable.
- Limit use and disclosure of Sensitive Personal Information, if applicable.

Requests can be submitted by contacting us at sai-ga@systema.us.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. Except where you have provided an agent with a Power of Attorney pursuant to Sections 4000 – 4465 of the California Probate Code, when using an authorized agent you must: (i) provide the agent with signed permission clearly describing their authority to make a request on your behalf; (ii) verify your own identity; and (iii) directly confirm that you have provided the authorized agent permission to submit the request. That agent must also be able to verify their identity with us and provide us with their authority to act on your behalf.

The verifiable consumer request initiated by you or your authorized agent must:

- Include your full legal name, email, and phone number, which we will need to contact you in order to verify that you are the person about whom we collected Personal Information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We may contact you in order to verify your identity. Depending on the nature of the request, we may require additional verification actions be taken. We will only use this information to verify the requestor's identity and/or authority to make the request.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the Personal Information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.

- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech rights and/or ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded.

The CCPA provides the right to be free from discrimination if you choose to exercise your rights under the statute, and we will not discriminate by:

- Denying you products or services.
- Charging you different prices or rates for products or services, including through the granting of discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of products or services.
- Suggesting that you may receive a different price or rate for products or services or a different level or quality of products or services.

Other California Privacy Rights. California residents have the right to receive information that identifies any third-party companies or individuals that Systema has shared your Personal Information with during the previous calendar year, as well as a description of the categories of Personal Information disclosed to that third party. You may obtain this information once a year and free of charge by contacting us at the email address below.

CHANGES TO THIS PRIVACY NOTICE

Systema may modify or update this Policy from time to time. We encourage you to revisit this page often to remain fully informed of our Policy or you can contact us at any time to obtain the latest copy of this Policy.

QUESTIONS ABOUT THIS POLICY

For questions or comments regarding our Policy, please contact us at: sai-ga@systema.us.