

# Consumer Data Privacy Policy

Issued: December 10th, 2020

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## **APPLIES TO: All Consumers**

**PURPOSE:** This privacy notice applies to all information collected through AST's Services, which includes use of <https://www.astcorporation.com>, all related subpages, surveys, videos or other data sharing functions delivered via our website or business platforms to gather feedback and access to AST professionals, as well as any related services, sales, marketing or events. Please read this privacy notice carefully as it will help you to understand what is done with the information AST collects.

## **POLICY:**

### **PRIVACY NOTICE**

Thank you for choosing to be part of our community at AST ("Company", "we", "us", or "our"). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about this privacy notice, or our practices with regards to your personal information, please contact us at [dataprivacy@astcorporation.com](mailto:dataprivacy@astcorporation.com) (Attention: AST Data Inquiries) or AST LLC, 4343 Commerce Court #701, Lisle, IL 60532.

When you use any of our Services ("Services" include access to AST and any sub-pages, use of surveys, videos or other data sharing functions delivered via our website or business platforms to gather feedback and access to AST professionals), we appreciate that you are trusting us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Services immediately.

This privacy notice applies to all information collected through our Services (which, as described above, includes use of surveys, videos or other data sharing functions delivered via our website or business platforms to gather feedback and access to AST professionals), as well as any related services, sales, marketing or events. Please read this privacy notice carefully as it will help to understand what is done with the information that we collect.

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### 1. WHAT INFORMATION DO WE COLLECT?

We only collect personal information that you disclose to us.

We collect personal information that you voluntarily provide to us when you register an interest in obtaining information about us or our Services, when you participate in activities online (such as posting messages in business platforms) or otherwise when you contact us.

The personal information that we collect depends on the context of your interactions with us, the choices you make and the products and features you use. The personal information we collect may include the following:

- Social Media Login Data - We may provide you with the option to register with us using your existing social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS" below.
- Automatically Collected Information - We automatically collect certain information when you visit, use or navigate AST. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location and information about when you use our and other technical information. This information is primarily needed to maintain the security and operation of our site, and for our internal analytics and reporting purposes.

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Like many businesses, we also collect information through cookies and similar technologies.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

## 2. WILL YOUR INFORMATION BE SHARED WITH ANYONE?

We may process or share your data that we hold on the following legal basis:

- Consent - We may process your data if you have given us specific consent to use your personal information for a specific purpose.
- Legitimate Interests - We may process your data when it is reasonably necessary to achieve our legitimate business interests.
- Performance of a Contract - Where we have entered into a contract with you, we may process your personal information to fulfill the terms of our contract.
- Legal Obligations - We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
- Vital Interests - We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.

More specifically, we may need to process your data or share your personal information in the following situations:

- Business Transfers - We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- Affiliates - We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy notice. Affiliates include our parent company and any subsidiaries, joint venture partners or companies that we control or that are under common control with us.
- Business Partners - We may share your information with our business partners to offer you certain products, services or promotions.
- Other Users - When you share personal information or otherwise interact with public areas of AST, such personal information may be viewed by all users and may be publicly made available outside the site in perpetuity. If you interact with other users of our site and register with us through a social network (such as Facebook), your contacts on the social network will see your name, profile photo, and descriptions of your activity. Similarly, other users will be able to view descriptions of your activity, communicate with you within our network, and view your profile.

### **3. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Notice.

### **4. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

Our site may offer you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, email address, friends list, profile picture as well as other information you choose to make public on the social media platform.

We will use the information we receive only for the purposes that are described in this privacy notice or that are otherwise made clear to you on the relevant platform. Please note that we do not control, and are not responsible for, other uses of your personal information by your third-party social media provider. We recommend that you review their privacy notice to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

### **5. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

Our servers are located in the United States of America and India. If you are accessing our site from outside these countries, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), and in other countries.

If you are a resident in the European Economic Area, then these countries may not necessarily have data protection laws or other similar laws as comprehensive as those in your country. We will however take all necessary measures to protect your personal information in accordance with this privacy notice and applicable law.

### **6. HOW LONG DO WE KEEP YOUR INFORMATION?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this notice will require us keeping your personal information for longer than seven years.

When we have no ongoing legitimate business need to process your personal information, we will either immediately delete or anonymize such information, or, 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.

### 7. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly solicit data from or market to children under 18 years of age. By using AST, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the site and/or Services. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we may have collected from children under age 18, please contact us at [dataprivacy@astcorporation.com](mailto:dataprivacy@astcorporation.com) or AST LLC, 4343 Commerce Court #701, Lisle, IL 60532.

### 8. WHAT ARE YOUR PRIVACY RIGHTS?

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). If you are a resident in Switzerland, the contact details for the data protection authorities are available here: <https://www.edoeb.admin.ch/edoeb/en/home.html>.

At all times, AST endeavors to abide by the terms of CCPA, along with other consumer data privacy legislation in each US state. This privacy policy serves as the notice of collection, and compliance with CCPA is further supported through AST's Information Security Policy, Privacy Impact Assessment, Breach Management Plan and Data Asset Inventory Summary. Consumers protected by CCPA retain the right to know about the personal information AST collects, how it is used and how it is shared, the right to have AST delete personal information, the right to opt out of the sale of personal information and the right to non-discrimination for exercising their CCPA rights.

If you would at any time like to review or change the information in your account or terminate your account, you can contact us at [datainquiries@astcorporation.com](mailto:datainquiries@astcorporation.com) or AST LLC, 4343 Commerce Court #701, Lisle, IL 60532.

Upon your request to terminate your data, we will deactivate or delete your account and information from our active databases. However, we may retain some information in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with applicable legal requirements.

Opting out of email marketing: You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we may still communicate with you, for example, to send you service-related emails that are necessary for the administration and use of your account, to respond to requests, or for other non-marketing purposes. To otherwise opt-out, you may make this request at [dataprivacy@astcorporation.com](mailto:dataprivacy@astcorporation.com) or AST LLC, 4343 Commerce Court #701, Lisle, IL 60532.



## 9. CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this privacy notice.

## 10. DO CERTAIN RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?

Yes. AST endeavors to adhere to all US state, federal and international privacy laws and is committed to conducting consistent reviews and updates to this privacy notice to adhere to laws in all geographies.

## 11. DO WE MAKE UPDATES TO THIS NOTICE?

We will consistently update this privacy notice. The updated version will be indicated by an updated "Revised" date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy notice, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy notice frequently to be informed of how we are protecting your information.

## 12. HOW CAN YOU CONTACT US ABOUT THIS NOTICE?

If you have questions or comments about this notice, you may email us at [datainquiries@astcorporation.com](mailto:datainquiries@astcorporation.com) or write to us at AST LLC, 4343 Commerce Court #701, Lisle, IL 60532.

## 13. HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?

Based on the applicable laws of your country, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request to review, update, or delete your personal information, please submit a request form by clicking [here](#). We will respond to your request within 30 days.

## REVISION HISTORY

Version	Date of Revision	Author	Description of Changes
1.0	December 10, 2020	AST	Initial version

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1.1	February 2022	AST	Annual Review
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