

ITC GLOBAL, INC. PRIVACY POLICY NOTICE

LAST UPDATED: November 17, 2020

ITC Global Inc. (“ITC Global,” “we,” “us,” or “our”) values your privacy. In this Privacy Policy Notice (“Policy”), we describe how we collect, use, and disclose information that we obtain about visitors to our website <https://www.itcglobal.com> (the “Site”) and corporate offices (collectively, the Site and corporate offices are referred as the “Services”), information collected to access our customer portal, information about the end-users who use the services of our satellite communications customers, as well as information collected about our employees.

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1. Scope and Consent

The services we provide require us to collect, store and process data. When doing so, we are committed to ensuring the protection and security of all data pertaining to our customers, prospects, suppliers, business partners and employees.

We want our company’s name to stand for setting the highest possible standard in data protection. As a globally operating corporation we view it as our duty to meet, and when possible exceed, requirements of all applicable laws and regulations and industry standards as well as implement the industry’s best practices.

Our Privacy Policy lays out strict requirements for handling personal information pertaining to customers, prospects, business partners and employees. It meets the requirements of the European Data Protection Directive and ensures compliance with the applicable principles of national and international data protection laws in force in all jurisdictions where we and our affiliates and subsidiaries have a business presence. The Policy sets a globally applicable data protection and security standard for our company and regulates the sharing of information between our business units, subsidiaries and affiliates.

As part of the overall compliance effort, we are committed to comply with the Privacy Principles pertaining to (1) Notice, (2) Data Integrity and Purpose Limitation, (3) Choice, (4) Security, (5) Access, (6) Accountability for Onward Transfer, and (7) Recourse, Enforcement and Liability.

2. Definition of “personal information”

When used in this Notice, “**personal information**” means any information relating to an identified or identifiable natural person or his or her household; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

3. Information Practices: How We Collect, Use, Retain, and Disclose personal information

The information we collect through the Services is controlled by ITC Global, which is headquartered in the United States at 3430 S. Sam Houston Pkwy East, Houston, Texas. The information collected through services offered through our customers is controlled by our customers.

The Information We Collect About You

We collect information about you directly from you and from third parties, as well as automatically through your use of our Site and Services.

Information We Collect Directly From You Through the Site. The information we collect from you depends on how you use our Site. When you contact us through the Site, we may collect identifiers such as your name, email address, company name, country of origin, phone number, and your reasons for contacting us.

Information We Collect About End-Users of our Customers’ Services. In order to provide the service offerings, it is sometimes necessary for us to collect certain personal information about users of such service offerings, including, but not limited to, account user name, IP address (local and public), session information and other usage data. It is important to note that some of this personal information may be provided to us by our customers. To the extent necessary for management of the service offerings and statistical purposes, we may retain collected personal information for a limited period of time, after which time the information will be discarded or destroyed. Where possible, any such retained personal information will be stripped of personal identifiers and rendered anonymous.

Customer billing and carriage of communications traffic associated with some of the service offerings may be conducted by one or more of our customers, e.g., a user’s home Internet service provider. As a result, an end user’s customer relationship is with such Internet service provider. In most cases we do not maintain a direct customer relationship with end users of the service, and do not collect, retain or have access to a user’s account information, including personal information.

Information We Collect Through Our Corporate Customer Relationships. In order to manage our customer relationships with our service partners, we collect identifiers and employment-related information about and from our customers’ employees. To request access to our customer portal (e.g. ITC SmartConnect), you may provide us with identifiers or employment-related information such as your name, your job title and the name of the customer company you work for; your contact information, such as your business email and phone number; and the username and password you would like to use to access the portal. We may seek other employee identifiers to administer our corporate customer contracts and to market our products and services to corporate customers.

Information We Collect Through Our Vendor/Supplier. In order to manage our relationships with our vendor/supplier and to provide access to our portals, we collect identifiers and employment-

related information about and from our vendor/supplier employees. To request access to our vendor/supplier portals, you may provide us with identifiers or employment-related information such as your name, your job title and the name of the ITC Global vendor/supplier you work for; your contact information, such as your business email and phone number; and the username and password you would like to use to access the portal. We may seek other personal information to administer our vendor/supplier due diligence process and contracts.

Information We Collect Automatically. We automatically collect the following identifiers and internet or other electronic network activity information about your use of our Site through cookies or other technologies: your domain name, your browser type and operating system, web pages you view, links you click, your IP address, the length of time you visit our Site, and the referring URL, or the webpage that led you to our Site. Please see the section “Our Use of Cookies” below for more information.

How We Use Your Information

We use your information, including your personal information, for the following purposes:

- To provide our services to our customers, to provide access to our portals, to communicate with you about your use of our Site or services, to respond to your inquiries, and for other customer service purposes.
- To tailor the content and information that we may send or display to you, to offer location customization, and personalized help and instructions, and to otherwise personalize your experiences while using the Site.
- For marketing and promotional purposes. For example, we may use your information, such as your email address, to send you a welcome email, news, and newsletters, special offers, and promotions, or to otherwise contact you about products, services or information we think may interest you.
- To better understand how users access and use our Site, both on an aggregated and individualized basis, in order to improve our Site and respond to user desires and preferences, and for other research and analytical purposes.
- To administer surveys and questionnaires.
- To administer our customer and supplier/vendor contracts. For example, we will use a customer’s and supplier/vendor’s employee’s contact information to send our invoices or to send service communications to.
- To comply with applicable legal or regulatory obligations, including as part of a judicial proceeding; to respond to a subpoena, warrant, court order, or other legal processes; or as part of an investigation or request, whether formal or informal, from law enforcement or a governmental authority.
- To protect the safety, rights, property, or security of ITC Global, our services, any third party, or the general public; to detect, prevent, or otherwise address fraud, security, or technical issues; to prevent or stop activity that ITC Global, in its sole discretion, may consider to be, or to pose a risk of being, an illegal, unethical, or legally actionable activity; to use as evidence in litigation; to conduct audits; and to enforce this Notice.

How We Share Your Information

We may share your information, including personal information, as follows:

- **Affiliates.** We may disclose the information we collect on the Site to our affiliates or subsidiaries for the purposes described in this Notice; however, if we do so, their use and disclosure of your personal information will be subject to this Notice.
- **Other Providers.** We may disclose the information we collect from you to third-party vendors, service providers, contractors or agents who perform functions on our behalf.

We also may disclose information in the following circumstances.

- **Business Transfers.** If we are or may be acquired by or merged with another company, if any of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer the information we have collected from you to the other company.
- **In Response to Legal Process.** We also may disclose the information we collect from you in order to comply with the law, a judicial proceeding, court order, or other legal processes, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Notice, or as evidence in litigation in which ITC is involved.
- **Aggregate and De-Identified Information.** We may share aggregate or de-identified information about users with third parties for marketing, advertising, research or similar purposes.

We Do Not Sell Your Personal Information

We have not sold your personal information in the preceding 12 months and do not intend to sell in the future without your prior written consent. We do not and will not sell the personal information of minors under 16 years of age without affirmative authorization.

Data Retention

Your information will be retained in accordance with our data retention policy which is designed to retain data for as long as needed for us to comply with our contractual obligations, employment obligations, and other business purposes, including global legal obligations to retain data.

4. Summary of Information Practices in Last 12 Months

The below table summarizes our personal information collection, use, and sharing practices in the preceding 12 months since we last updated this Notice. As reflected in this table, we may share your personal information with the below entities.

| Category of Personal Information Collected | Examples | Categories of Sources | Commercial/Business Purpose | Categories of Third Parties with Whom ITC Global Shares PI |
|--|---|---|--|---|
| Professional or Employment-related Information | Job history, educational history, First Name, Last Name, Physical Address | Applicants, corporate customers, and outside sources such as credit bureaus | Process and evaluate applications for positions with ITC Global, administrative purposes | Service providers such as HR vendors, cloud providers or payroll processors |

| | | | | |
|--|---|---|---|--|
| Business Contact | First Name, Last Name, Login ID, Password, phone number, email address, physical address, job title | Business Contacts | Administration of corporate customer and vendor/supplier contracts, education and marketing of our products and services to corporate customers, access to our portals or systems | Cloud service provider |
| Marketing Contact/Subscriber | First Name, Last Name, email address | Marketing contact directly, Subscriber directly | Education of our new products and services, our events at trade shows, communications | Cloud service provider |
| Corporate Website Visitor | IP Address, referring URL, | Corporate Website Visitor | Education of our new products and services | Cloud service provider |
| Corporate Office Visitor | First Name, Last Name, | Corporate Office Visitor | Security, Allowing Access to our Corporate premises | N/A |
| Information We Collect as a Service Provider on Behalf of our Customers | | | | |
| Identifiers | Full name, email address, phone number, account login | You, your Internet service provider | Processing payments, customer services, protecting against malicious, deceptive, fraudulent or illegal activity and enabling or effecting, directly or indirectly, a commercial transaction | Service providers, legal counsel, law enforcement authorities, and those involved in legal proceedings, with consent |
| Unique identifiers or personal identifiers | IP address, MAC addresses | You | Processing or fulfilling orders and transactions, and enabling or effecting, directly or indirectly, a commercial transaction | Service providers |
| Internet and other network activity | Browsing activity | You, Your mobile devices and computers | Customer inquiry and troubleshooting purposes | Your Internet service provider |

5. Our Use of Cookies

We and our third-party service providers may use cookies or other tracking mechanisms to track information about your use of our Site.

Cookies. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser for record-keeping purposes. Our Site uses functional cookies, strictly necessary cookies, performance cookies and targeting cookies. For further details regarding cookies used on our Site and to adjust your settings, please consult the information included in the Cookie tool displayed at the bottom left of our Site's pages.

Disabling Cookies. You can enable and disable the various cookies used on our site through our Cookie Settings too in the Cookie tool displayed at the bottom left of our Site's pages. Please also note that most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Service Provider Analytics. We use automated devices and applications, such as Google Analytics, to evaluate usage of our Site. We also may use other analytic means to evaluate our Site. We use these tools to help us improve our Site, performance, and user experiences. These entities may use cookies and other tracking technologies to perform their services. To learn more about Google's privacy practices, please review the Google Privacy Policy at <https://www.google.com/policies/privacy/>. You can also download the Google Analytics Opt-out Browser Add-on to prevent their data from being used by Google Analytics at <https://tools.google.com/dlpage/gaoptout>.

6. Third-Party Links

Our Site may contain links to third-party websites. Any access to and use of such linked websites is not governed by this Notice but instead is governed by the privacy policies of those third-party websites. We are not responsible for the information practices of such third-party websites.

7. Security of My Personal Information

We have implemented reasonable security measures to protect the information we collect from unauthorized access, exfiltration, theft, loss, misuse, disclosure, alteration, or destruction. Please be aware that despite our best efforts, no data security measures can guarantee security.

You should take steps to protect against unauthorized access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your log-in and password private. We are not responsible for any lost, stolen, or compromised passwords or for any activity on your account via unauthorized password activity.

8. Children's Privacy

Our Site is not directed to children under the age of sixteen (16), nor do we market products or services to such children. We request that children do not provide personally identifiable information through our Site. We do not knowingly collect information from children under 16 without parental consent.

9. Information for EU Individuals

Our Notice lays out strict requirements for handling personal data pertaining to customers, prospects, vendors/suppliers, and employees. It meets the requirements of the General Data Protection Regulation (GDPR) and ensures compliance with the applicable principles of national and international data protection laws. The policy sets a globally applicable data protection and security standard for our company and regulates the sharing of information between our business units, subsidiaries, and affiliates.

As part of the overall compliance effort we are committed to complying with the Privacy Principles pertaining to (1) Notice, (2) Data Integrity and Purpose Limitation, (3) Choice, (4) Security, (5) Access, (6) Accountability for Onward Transfer, and (7) Recourse, Enforcement and Liability.

10. GDPR Compliance

When we act as Data Controller: If we process your personal information in our capacity as a data controller, the following applies:

We collect, use, and share your personal information where we are satisfied that we have an appropriate legal basis to do this. This may be because:

- Our use of your personal information is in our legitimate interest as a commercial organization (for example in order to make improvements to our products and services and to provide you with information you request); you have a right to object to the processing as explained in the section below titled Your Legal Rights;
- Our use of your personal information is necessary to comply with a relevant legal or regulatory obligation that we have (for example, where we are required to disclose personal information to a court); or
- Our use of your personal information is in accordance with your consent (for example, when you consent to the receipt of a welcome email, news, newsletters, and marketing communications).

If we process your data as a Data Processor: For certain activities where we provide satellite communications services to our corporate customers, including Internet service providers, we act only on the instruction of those corporate customers. In those situations, the corporate customer is the Data Controller for that purpose. Where we process your data in our capacity as a data processor on behalf of the Data Controller, you may exercise your data subject access rights by contacting your Internet service provider directly.

Your Legal Rights under GDPR. Subject to certain exemptions, and in some cases dependent upon the processing activity we are undertaking, European Union individuals have certain rights in relation to your personal information:

Right to access, correct, and delete your personal information: You have the right to request access to the personal information that we hold about you and:(a) the source of your personal information; (b) the purposes, legal basis and methods of processing; (c) the data controller's identity; and (d) the entities or categories of entities to whom your personal information may be transferred. You also have the right to request that we delete your information. We are not required to comply with your request to erase personal information if the processing of your personal information is necessary for compliance with a legal obligation or for the establishment, exercise, or defence of legal claims.

Right to restrict the processing of your personal information: You have the right to restrict the use of your personal information when (i) you contest the accuracy of the data; (ii) the use is unlawful but you do not want us to erase the data; (iii) we no longer need the personal information for the relevant purposes, but we require it for the establishment, exercise, or defence of legal claims; or (iv) you have objected to our personal information use justified on our legitimate interests verification as to whether we have a compelling interest to continue to use your data.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to data portability: To the extent that we process your information (i) based on your consent or under a contract; and (ii) through automated means, you have the right to receive such personal information in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller.

Right to object to the processing of your personal information: You can object to any processing of your personal information which has our legitimate interests as its legal basis if you believe your fundamental rights and freedoms outweigh our legitimate interests. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority as well.

How to Exercise Your Rights: In situations where we are a Data Controller, if you would like to exercise any of the rights described above, please send us an email request to privacy@itcglobal.com. In your message, please indicate the right you would like to exercise and the information that you would like to access, review, correct, or delete.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee where permitted by law, for instance, if your request is manifestly unfounded or excessive.

We may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Cross-border Transfer of Information. ITC Global generally maintains servers and systems in the United States hosted by service providers. We also may subcontract the processing of your data to, or otherwise share your data with, other third parties in the United States or countries other than your country of residence. As a result, where the personal information that we collect through the Site or in connection with providing services to or administering our relationship with a corporate customer and vendor/supplier is transferred to and processed in the United States or anywhere else outside the European Economic Area (EEA) for the purposes described above, we will take steps to ensure that the information receives the same level of protection as if it remained within the EEA, including entering into data transfer agreements, using the EU Commission approved Standard Contractual Clauses or, as applicable, relying on other transfer mechanisms provided in the GDPR. You have a right to details of the mechanisms under which your data is transferred outside the EEA.

11. Privacy Shield

As part of our overall privacy compliance efforts, and despite the invalidation of the EU-US Privacy Shield and the Swiss-EU Privacy Shield programs (the “Privacy Shield”) by the European Union Court of Justice and the Swiss Federal Data Protection and Information Commissioner, we continue to comply with the Privacy Shield. Our certification with the Privacy Shield may be verified by accessing the Privacy Shield List at <https://www.privacyshield.gov/Registration>.

PRIVACY SHIELD PRINCIPLES. We comply with the seven Privacy Principles established by the Privacy Shield:

1. NOTICE. By providing this Notice we inform you about (1) our participation in the Privacy Shield and provide above a link to the Privacy Shield List, (2) the types of personal information we collect and the adherence of all our business units, subsidiaries and affiliates to the Principles, (3) our commitment to treat all personal information received from the EU in reliance on the Privacy Shield

in accordance with the Principles, (4) the purposes for which it collects and uses personal information, (5) how to contact us with any inquiries or complaints, including any relevant establishment in the EU that can respond to such inquiries or complaints, (6) the type or identity of third parties to which we disclose personal information, and the purposes for which we do so, (7) the right of individuals to access their personal information, (8) the choices and means we offer individuals for limiting the use and disclosure of their personal information, and (9) the independent dispute resolution body designated to address complaints and provide appropriate and free-of-charge recourse, (10) being subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission, the U.S. Department of Transportation or any other U.S. authorized statutory body, (11) your right, under certain conditions, to invoke binding arbitration, (12) our requirement to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, and (13) our liability in cases of onward transfers to third parties.

2. CHOICE. If applicable, we offer you the opportunity to choose (opt out) whether your personal information is (1) to be disclosed to a third party or (2) to be used for a purpose that is materially different from the purpose for which it was originally collected or subsequently authorized by you. If this option is not offered to you automatically when the information is collected please contact us at the contact information provided below.

Please note that in some cases it is not necessary to provide choice when disclosure is made to a third party that is acting as an agent to perform tasks on behalf of and under the instructions of the organization. However, we will always enter into a contract with the agent.

Certain information is considered “Sensitive personal information.” As used herein, Sensitive personal information means personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information pertaining to the sex life of the individual. For sensitive personal information, we will obtain the affirmative express consent (“opt-in”) from you if such information is to be (1) disclosed to a third party or (2) used for a purpose other than those for which it was originally collected or subsequently authorized by you through the exercise of opt-in choice. In addition, we should treat as sensitive any personal information received from a third party where the third party identifies and treats it as sensitive.

3. ACCOUNTABILITY FOR ONWARD TRANSFER. To transfer personal information to a third party acting as a controller, we comply with the Notice and Choice Principles. We enter into a contract with the third-party controller that provides that such data may only be processed for limited and specified purposes consistent with the consent provided by you and that the recipient will provide the same level of protection as the Principles.

To transfer personal information to a third party acting as an agent, we: (1) transfer such data only for limited and specified purposes; (2) ascertain that the agent is obligated to provide at least the same level of privacy protection as is required by the Principles; (3) take reasonable and appropriate steps to ensure that the agent effectively processes the personal information transferred in a manner consistent with the our obligations under the Principles; (4) upon notice, take reasonable and appropriate steps to stop and remediate unauthorized processing; and (5) provide a summary or a representative copy of the relevant privacy provisions of its contract with that agent to the Privacy Shield organization upon request.

4. SECURITY. We have in place reasonable and appropriate measures to protect the personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the processing and the nature of the personal information.

5. DATA INTEGRITY AND PURPOSE LIMITATION. Our processing of personal information is limited to the information that is relevant for the purposes of processing. We do not process personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by you. To the extent necessary for those purposes, we take reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and current. We will adhere to the Principles for as long as it retains such information.

6. ACCESS. We will provide you with access to your personal information that we hold and you will be able to correct, amend, or delete that information where it is inaccurate, or has been processed in violation of the Principles, except where the burden or expense of providing access would be disproportionate to the risks to your privacy in the case in question, or where the rights of persons other than you would be violated.

7. RECOURSE, ENFORCEMENT AND LIABILITY. Effective privacy protection must include robust mechanisms for assuring compliance with the Principles, recourse for individuals who are affected by non-compliance with the Principles, and consequences for the organization when the Principles are not followed. Therefore, our Policy provides for: (1) readily available independent recourse mechanisms by which your complaints and disputes will be investigated and expeditiously resolved at no cost to you and by reference to the Principles, and damages awarded where the applicable law or private-sector initiatives so provide; (2) follow-up procedures for verifying that the attestations and assertions we make about our privacy practices are true and that privacy practices have been implemented as presented and, in particular, with regard to cases of noncompliance; and (3) obligations to remedy problems arising out of our failure to comply with the Principles and compliance with any sanctions assessed against us.

ITC GLOBAL RECOURSE MECHANISM. Any questions or concerns regarding the use or disclosure of personal information should be directed to address listed in the Contact section of this notice, below. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Policy. For complaints that cannot be resolved directly between us and you, we have agreed to participate in the following dispute resolution procedures in the investigation and resolution of complaints to resolve disputes pursuant to the Privacy Shield Principles: (1) for disputes involving employment-related personal information received by us from the EEA, we have agreed to cooperate with the data protection authorities in the EEA and to participate in the dispute resolution procedures of the panel established by the European data protection authorities; (2) for disputes involving all other personal information received by us from the EEA, we have agreed to use International Centre for Dispute Resolution, a division of the American Arbitration Association dispute resolution (“ICDR/AAA”). Individuals who submit a question or concern to us and who do not receive acknowledgment of the inquiry or who think their question or concern has not been satisfactorily addressed should then contact the ICDR/AAA on the Internet (<http://www.icdr.org>), by mail, phone or by fax. The website lists the addresses, phone/fax number for your location. Inquiries by mail or fax should identify ITC Global, Inc. as the company to which a concern or question has been submitted, and include a description of the privacy concern, the name of the individual submitting the inquiry, and whether ICDR/AAA may share the details of the inquiry with us. ICDR/AAA will act as a liaison to our company to resolve these disputes. The dispute resolution process shall be conducted in English. Please note that we are also subject to the jurisdiction of the U.S. Federal Trade Commission and other U.S. government agencies.

EU Data Protection Authorities (HR Data). ITC Global commits to cooperate with EU Data Protection Authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

12. California Residents: Choices for Access, Deletion, and Right to Non-Discrimination

If you are a California resident, you have the right to know what personal information we collect, use, disclose or sell about you under the California Consumer Privacy Act (“CCPA”). Additionally, you have the right to access and delete your personal information. Please note, if you are the end-user of an Internet service provider and would like to exercise your rights under the CCPA, please contact your Internet service provider directly.

To exercise these privacy rights and choices, please follow the instructions below:

- *How to request access to your personal information:* You may request access to your personal information twice in a 12-month period. To do so, please email privacy@itcglobal.com, or call 1-800-208-5648. Note, we may not always be able to fully address your request, for example, if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.
- *How to request deletion of your personal information:* You may request that ITC Global delete the personal information it has collected and/or maintained about you. To do so, please email privacy@itcglobal.com or call 1-800-208-5648. Note, we may need to retain certain personal information as permitted by law, detect security incidents, protect against malicious, deceptive, fraudulent or illegal activities, comply with legal obligations or to enable solely internal uses that are reasonably aligned with your expectations or lawful within the context in which you provided the information.

Verification: Please note that we will take steps to verify your identity before fulfilling any of the above requests. As we don't have two pieces of personal information from you, we will request a copy of your California identification as well as request you to verify through an authentication e-mail.

Authorized Agents: Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to you. In order to designate an authorized agent to make a request on your behalf, you must provide written proof that you have consented to this designation unless the agent has power of attorney pursuant to California Probate Code sections 4000-4465. You must also verify your identity directly with us by providing a copy of your government issued identification.

Response Timing and Format: We will respond to a verified consumer request for personal information within 45 days of receipt. If we require more time (up to 90 days), we will notify you of the reason and extension period in writing.

Anti-Discrimination Right: You have the right to be free from discrimination in product quality, goods or services if you choose to exercise your privacy rights under the CCPA.

Do Not Track: Your browser may deliver a “Do-Not-Track (‘DNT’) signal” to this Site. We will honor a “Do-Not-Track” signal as a valid opt-out request.

13. Additional Choices

What Choices Do I Have Regarding Promotional Emails?

We may send periodic promotional emails to you. You may opt-out of such promotional emails by following the opt-out instructions contained in the email. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving promotional emails, we may still send you emails about your account or any services you have requested or received from us.

Access To My Personal Information

If you have created an account to access any of our customer and vendor/supplier portals, you may modify the personal information that you have submitted by logging into your account and updating your information. Please note that copies of information that you have updated, modified or deleted may remain viewable in cached and archived pages of the Services for a period of time.

If you are a resident of the European Union, please see the Information for EU Individuals section above for additional information on accessing your information and other legal rights available to you under European Union law.

14. Contact Us

Questions or comments regarding ITC Global's Privacy Notice should be submitted to ITC Global by mail or e-mail at the addresses provided below. Any complaints regarding ITC Global's adherence to this Privacy Notice or the requirements of the European General Data Protection Regulation, should be addressed to ITC Global by mail or email at ITC Global, Inc. (Attn: Legal Department), 3430 S. Sam Houston Parkway East, Suite 500, Houston, Texas 77047 USA, email: privacy@itcglobal.com.

15. Changes

ITC Global may change this Notice and the related Privacy Policy from time to time, consistent with the requirements of the relevant laws and regulations. ITC Global will post any revised Notice in its work places, train its employees about any substantive changes, if necessary, and will publish any amended Privacy Policy on this website or any similar website.