

Vertellus Global Data Privacy Policy

Vertellus respects individual privacy and is committed to complying with all legal requirements. This policy defines the commitment of Vertellus to protect the privacy of personal information that is collected or used by Vertellus in the course of business. We will align our business processes to comply with this Policy and will, from time to time and as appropriate, review our practices to assure compliance with applicable laws and regulations.

- Notice** We will give notice when personal information is collected, as required by applicable law, explaining the purposes for which it is collected and manner in which it will be used.
- Choice** To the extent required by applicable law, we will adopt and maintain procedures to afford individuals the opportunity to opt out of information disclosure by us to a third party, or to use such information, not provided in an initial notice. Such procedures will also assure that sensitive information is collected and used in a lawful manner.
- Transfer** The principles above of Notice and Choice generally apply to our transfer of information to third parties. Accordingly and to the extent required by applicable law, we will transfer personal information within the Vertellus group of companies and to third parties in a manner consistent with our notice and choice procedures and pursuant to appropriate safeguards.
- Access** We will maintain commercially reasonable procedures consistent with applicable law affording individuals access to their collected personal information and when appropriate, the opportunity to correct, amend or delete such personal information.
- Security** We will use commercially reasonable efforts to secure personal information from loss, misuse, and unauthorized access, disclosure, alteration and destruction.
- Integrity** We will take reasonable commercial steps to ensure that information is reliable for its intended use, accurate, complete and current.
- Recourse** We will provide a means of recourse to resolve individual concerns or disputes regarding our collection and use of personal information.

Vertellus reserves the right to modify and update these principles or its related business practices at any time.