

# **PRIVACY POLICY OUR PRIVACY POLICY**

## **PRIVACY POLICY**

RITEK Group is a global organization comprising a group of entities affiliated with, controlled by or under common control. Accordingly references in this Privacy Policy and elsewhere on this website to ‘Kingston’, ‘our’, ‘we’ or ‘us’ mean RITEK Group and entities affiliated with, controlled by or under common control with it, as the context so requires. This Privacy Policy applies to all information, including personal information, collected about you by RITEK.

The term “PII” used in this Privacy Policy means Personally Identifiable Information. It comprises any information that can help us identify or locate an individual, including, without limitation, an individual’s name, address, e-mail address, telephone number, an online identifier (for example, a social media account), date of birth, bank account and other financial records, documents used for ID purposes including driver licenses, passports and credit card number. PII does not include publicly available information that is lawfully made available to the general public from federal, state or local government records.

At RITEK we know that protecting your privacy is important, which is why we have written this Privacy Policy to explain:

- When we collect information
- What type of information we collect
- How we collect information
- How we use information
- With whom we share information

## **WHEN DO WE COLLECT INFORMATION?**

RITEK may collect information about you when you interact with us such as (but not limited to):

- Accessing or browsing any website, web property, or web-based function directly created by or controlled by RITEK, or any of our social media accounts
- Ordering RITEK products or services, engaging with customer care or product support
- Communicating with us via e-mail, telephone, fax or other manner

- Registering your RITEK product or filling out a survey
- Participating in a RITEK promotion, including but not limited to rebates, contests, etc.
- Requesting or registering to receive information about our products or services, whether with RITEK or an agent of Kingston
- Meeting face to face or handing over your business card at a trade show, exhibition, corporate event, meeting, conference, PR event, training or technology seminar or any other event

## **WHAT INFORMATION DO WE COLLECT?**

The information we collect is generally of two types: personally identifiable information (referred to in this Privacy Policy as “PII”, which we have defined above) and non-personally identifiable information.

Non-personally identifiable information comprises information that does not by itself identify an individual. This information generally includes anonymous information about an individual’s use of the website that includes, among other things, information concerning date and time of visit, the pages of the website visited, path through the website, IP address, the type of browser and operating system used.

## **HOW DO WE SHARE THE INFORMATION THAT WE COLLECT?**

- **General**

PII which we collect for a particular purpose will only be saved and used for that purpose, unless you have agreed to allow us to use it for some other purpose, as described in this Privacy Policy. We sometimes share non-personal information with third parties about our user base, but that information does not include any PII. Except as set forth in this Privacy Policy, we do not trade, share, rent, sell or give away information concerning you to third parties.

- **Our Affiliates**

Subject to applicable data protection law, we may share your PII with legal entities that are directly or indirectly controlled by us or who share common control with us. These affiliates may use your PII only in accordance with this Privacy Policy and for the purposes and reasons it sets out.

- **Our Service Providers and Strategic Partners**

We may disclose your PII to certain businesses that provide services to RITEK. For instance (without limitation) we will disclose your credit card information to our

financial service providers and banks for processing, data collected about our products and/or services which interest you will be used by the company which administers our customer mailing list, and your name and address shall be disclosed to the delivery service we use to deliver products you purchase on the website. These third-party service providers and partners will have access to PII needed to perform their functions but may not use it for other purposes.

We may also disclose your PII to other businesses so that they can provide you with information about products and services that may be of interest to you but only if you have consented to this by ticking the relevant box situated on the form on which we collect your information.

- **Enforcement**

We may disclose your PII or otherwise use such information to the extent that such disclosure or use may be required and to the extent necessary to meet Kingston's legal obligations and the protection of RITEK's legitimate legal and business interests, and its rights, property and employees.

We may also disclose any of your PII in response to valid requests by public authorities, including to meet national security or law enforcement enquiries, or to other appropriate third parties in connection with criminal investigations, investigation of fraud, infringement of intellectual property rights, or other suspected illegal activities, or as otherwise may be required by applicable law, or, as are reasonably necessary.

### **Aggregated General Information**

We may share aggregated general information about the website with our corporate partners, investors, advertisers or others. Aggregate general information includes without limitation the number of users of the website, revenue including payments by the users, usage statistics and user feedback. Aggregated general information does not include any PII that could be used to contact or identify you.

### **Change of Control**

In the event that another company acquires a controlling interest in RITEK or if we experience some other change of control event such as merger, insolvency, bankruptcy or receivership, we reserve the right to include any or all user-related information (including PII) among the assets transferred to the acquiring company. Any new owners of our business may use your PII in the same way as set out in this

Privacy Policy, and shall be required to respect the security of your PII and treat it in accordance with the law and for the purposes specified in this Privacy Policy.

### **HOW LONG WILL WE KEEP YOUR DATA?**

The time for which we will keep your data will depend on the purposes for which we process them, as explained below:

#### Purpose

Time for which the data are kept

##### 1. Corporate Contact and Customer Contact

We will process your data for the time necessary to meet your request or application.

##### 2. Analysis of usability and quality

We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymise your browsing data. As well as during the strictly necessary time to address your suggestion.

### **CHANGES TO PRIVACY POLICY**

We may update our Privacy Policy from time to time by posting a new version of it on the website. We encourage you to check the website regularly for information about revisions to this Privacy Policy. If you object to the change to our Privacy Policy, then you must contact us by any of the methods set out above regarding your objection.