

QDXray Privacy Policy

Your privacy is very important to us at QDXray, [A Sonitu Innovations B.V. (Holding Company) a European (NL) Corporation ("QDXray"), Incorporation No. <u>73593516</u>, with its registered place of business being located in Rotterdam, The Netherlands; hereinafter also "we" and/or "us" and/or "QDXray"].

Our goal is to provide you with a positive experience on our products/ devices and services and when using our QDXray Cloud software (the "Software") or our smartphone and tablets applications (the "Service") but keeping your personal information secure. To better protect your privacy we provide this notice explaining our online information practices and the choices you can make about the way your information is collected and used. To make this notice easy to find, we make it available on our homepage and at every point where your personal information may be requested, e.g. QDXray user page.

By using the Software or the Service, you are accepting and consenting to the terms and conditions described in this privacy statement.

General Terms:

This privacy statement informs you about how QDXray collects and manages data. In order to offer our products and/or services and their functions, and to improve these products and/or services if needed, it is necessary for us to process network telemetry data. The data is collected real- time by QDXray collectors installed in Telco datacenters.

Contact Information:

If you have any questions in relation to this privacy statement, please get in touch with us at via info@qdxray.com

Purpose of processing and legal grounds:

In the following paragraphs, you can read about the purposes of collecting personal data and the applicable legal grounds.

- Providing our product and our services: It will be necessary for us to process certain data such as device and network details as well as wireless performance data in order to provide the products and services that you ordered or to which you subscribed, in the context of delivery of the product and/or service and billing, as well as customer support.
- Product development and improvement: Naturally we strive to always improve our products and services in order to make them fit our customers' needs. For this reason, and based on our legitimate interest in doing so, we process data such as device and network information and draw insights in relation to possible improvements.



Duration

We will process your data as long as necessary to provide our products and services, and beyond such time to the extent legally permitted and based on our legal obligations (e.g. in relation to invoice retention) or legitimate interests (e.g. in retaining data for the purposes of responding to possible disputes or complaints or for possible reactivation of subscriptions). As a result, unless explicitly requested by the data subject, not all your data will be deleted after the end of the provision of the services, but we limit our processing to what is necessary.

Data transfer

The data collected by us may be transferred to other QDXray entities for the purposes mentioned under section 3 above (purpose of processing and legal grounds) as well as to any third parties to whom the relevant QDXray entity subcontracts all or part of this processing. This may for instance include hosting providers and any other relevant roles. Note that we will never sell your data to a third party.

In the event of transfer of data to a country outside of the European Economic Area, including the United States, **QDXray** systematically ensures the application of an adequate level of protection of such data by means approved by applicable data protection legislation.

QDXray may also, pursuant to a valid legal process (such as a search warrant, subpoena, or court order), allow access to information in our possession, in order to comply with such process and to protect our rights and property. We reserve the right to disclose any data or information obtained from or about our customers, to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of our assets, to the extent that this is necessary for the process.

Your rights

Under local laws, you may benefit from various rights as "data subject". You can exercise any of the rights listed hereunder by submitting your request by email to info@qdxray.com. Please note that we may reject requests that are excessive or a misuse of the relevant right.

- Access right and data portability: You may have the right to access your network data processed by
 us, as well as to obtain the portability of data you have provided to us to the extent applicable.
- Data accuracy: right of rectification and right to erasure: You may also have the possibility to request the rectification or erasure of any end-consumer data, provided that the applicable legal requirements are met. The right to erasure is nevertheless subject to various exceptions, notably as regards data whose processing is necessary to support litigation or for compliance with statutory retention requirements. In such a case,however, we limit our processing to the extent possible.
- Limits to processing: right to restriction, right to object & consent withdrawal: You may have the right, if applicable legal provisions are met, to object to the processing of personal data based on our legitimate interests and to otherwise obtain the restriction of certain forms of processing in specific circumstances. We will in each case examine your request and check whether you meet the requirements for the processing to be stopped.
- Right to lodge a complaint with the supervisory authorities: You may have the right to lodge a complaint with the data protection supervisory authority, depending on your place of residence.



Commitment to data security

In order to prevent unauthorized access, maintain data accuracy, and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the information we collect online.

Changes to this Privacy Statement

We may update and change this privacy statement from time to time, as we may find necessary and as our site evolves and grows. While we will do our best to bring updates to your attention, it is your responsibility to keep track of such updates. Your continuing use of this site constitutes an acknowledgement of any changes in this privacy statement.