

Privacy Policy - Effective Date 5th January 2024

Contact Details

Ascendant Manufacturing Solutions LLC ("Ascendant") respects your privacy and is committed to protecting your personal data.

Ascendant is located at 409 White Oak Ridge Road, Short Hills New Jersey 07078 USA.

Ascendant is a controller and processor of personal data (collectively referred to as, "we", "us" "our", or "Ascendant" in this Privacy Policy). This Privacy Policy describes how we handle and protect your personal data in connection with our website and our business activities. We may update this Privacy Policy as we implement new personal data practices or adopt new privacy policies.

We have appointed a Data Protection Manager (DPM) responsible for data protection who can be contacted via the following email address: dataprotection@ascendantmfg.com

Personal Data

Personal data, or personal information, means any information about an individual from which that person can be identified and includes contact information, such as your name, e-mail address, company name, address, phone number, and other information about yourself or your business. Personal data can also include information about you that is available on the internet, such as from Facebook, LinkedIn, Twitter and Google, or other publicly available information.

The personal data collected by us may include:

- Name (first name and surname)
- Company telephone number and email
- Personal telephone number and email
- Company name
- Location
- Job title
- Qualifications and work experience
- IP address
- Bank details (to process relevant payments if you are a contractor or client)

Collection of Personal Data

We collect personal data:

- When you provide it to us directly
- When you visit our website
- From publicly available online third-party sources

We do not intend to collect personal information online from children under the age of 18. If you believe that we have collected information about a child under 18, please contact us, so that we may delete the information.

Use of Personal Data

We will only use your personal data as permitted by law. Our legal basis for the processing of your personal information is:

- Where you have given consent for the processing of data for a specific purpose
- To meet contractual obligations entered into by you

- To fulfil a compelling legitimate interest that does not outweigh your rights and freedoms
- To comply with a legal obligation

The legitimate interests relied upon by us are as follows:

- Run our website effectively
- Collect information about website visitors
- Conduct business development activities including direct marketing by email
- Recruitment
- Send out and reply to requests for work
- Invoicing clients and paying vendors
- Conduct research commissioned by our clients
- Perform internal audits
- Project resourcing and budget allocation for client work

Ascendant may be required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

We Never Sell Personal Data

We will never pass on your personal information to other organizations for them to use for their own marketing purposes.

International Transfer of Personal Data

Your Personal Data may be collected, transferred to and stored by us in the United States as well as by third parties, such as contractors, in other countries. Any third parties such as suppliers or contractors that we use, have agreements with us to ensure they treat any personal data with the same privacy principles that we at Ascendant uphold.

Ascendant complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Ascendant has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Ascendant has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program, and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

In compliance with the Framework Principles, Ascendant commits to resolve complaints about our collection or use of your personal information.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Ascendant commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and

Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Ascendant commits to resolve DPF Principles-related complaints about our collection and use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF should first contact: dataprotection@ascendantmfg.com

An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Data Privacy Framework compliance not resolved by any of the other Data Privacy Framework mechanisms, please refer to Annex I for additional information: <https://www.dataprivacyframework.gov/s/article/ANNEX-I-introduction-dpf>

In the context of an onward transfer, a Data Privacy Framework organization has responsibility for the processing of personal information it receives under the Data Privacy Framework and subsequently transfers to a third party acting as an agent on its behalf. Ascendant Manufacturing Solutions LLC shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.

Individuals may have the right to limit the use and disclosure of their personal information as required by the Data Privacy Framework, such as whether your personal information is disclosed to a third party or used for purposes materially different from the purpose for which the personal information was originally collected or subsequently authorized by you.

If you wish to limit the use and disclosure of personal information in accordance with the Data Privacy Framework, please contact us at dataprotection@ascendantmfg.com.

Enforcement

Ascendant regularly reviews how we are meeting these privacy promises, and we provide an independent way to resolve complaints about our privacy practices. Ascendant is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to obtain an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

How Long We Hold Your Data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Details of retention periods for different aspects of your personal data are available from our DPM.

Cookies

Our website uses cookies, which include:

- Technical Cookies that are necessary to allow us to operate our website
- Analytical cookies such as Google Analytics for tracking and reporting of website traffic and to help analyze how users interact with the website. Google Analytics uses "cookies", which are text files placed on your computer to collect standard Internet log information and visitor behaviour in an anonymous form. The information generated by the cookie about your use of the website (including IP address) is transmitted to Google

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit www.aboutcookies.org or www.allaboutcookies.org.

Social Media

Our website may include Social Media Features, such as Facebook, LinkedIn or Twitter. These features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the features to function properly. Social Media Features and Widgets are either hosted by a third party or hosted directly on our website. This Privacy Policy does not apply to these features. Your interactions with these features are governed by the privacy policy and other policies of the companies providing them.

Your Rights

At any point while we are in possession of your personal information, you have the following rights:

- The right to access your personal information
- The right to edit and update your personal information
- The right to request to have your personal information deleted
- The right to restrict processing of your personal information
- The right to object
- The right to lodge a complaint with a supervisory authority

To exercise any of these rights, please contact our DPM at dataprotection@ascendantmfg.com

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Opting Out

You can ask us to stop sending you marketing emails at any time by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us because of a product/service purchase, product/service experience or other transactions.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

Time Limit to Respond

We try to respond to all legitimate requests within one month.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.