



## Origen Privacy Policy

**CONFIDENTIAL INFORMATION**

The content of this document is confidential. Consequently, this information shall not be disclosed under any circumstances, nor used for other purposes other than those for which the document was created without prior authorization from Origen Technologies.

# Origen Privacy Policy

This Privacy Policy explains how Origen Technologies, and its subsidiaries collect, use, and disclose information you provide to us or which we otherwise collect (“Information”), including “Personal Data” by which we mean Information that allows us to determine your identity.

This Privacy Policy applies to Origen Technologies and to other websites Origen Technologies operates that link to this Privacy Policy. From time to time, Origen Technologies acquires companies that may operate under their own privacy policies. You will continue to be presented with those companies’ privacy policies on their websites until the integration with Origen Technologies is complete and those websites are linked to this Privacy Policy.

The use of our products and services, including those available through other origentech.com websites that link to this Privacy Policy (collectively, “Offerings”), are subject to the terms of the applicable customer agreement. The use of our website is subject to the Origentech.com website's

## Data Collection

There are two primary ways in which Origen Technologies collects Information about you: through Interactions and Offerings as set forth below.

## Interactions

When you interact online or offline with Origen Technologies, we may receive your Information, including your Personal Data. For example, we receive your Information when you:

- Visit Origen Technologies’ websites or offices
- Download materials through our websites
- Provide or update account information through our websites
- Register for or attend Origen Technologies -hosted or sponsored events (such as promotional events, webcasts, contests, or hackathons)
- Participate in community programs and Origen Technologies -managed repositories on third-party open-source platforms
- Communicate with us including by emails, phone, texts, and online chats
- Provide testimonials

We collect Information about you from other sources such as public databases, commercial data sources, joint marketing partners, resellers, managed services providers and other partners, social media platforms, and conference/event hosts.

We refer collectively to these contacts as “Interactions” and we explain below how we use the Information we collect through them.

## What We Collect via Your Interactions

We (or others acting on our behalf) may collect your Information, including your Personal Data, through Interactions. The Personal Data we collect includes such things as:

- Name or alias
- Email address
- Physical address, including country
- Employer
- Title / position
- Payment details
- Phone number
- Username / user ID
- IP address
- MAC address (or other device identifiers automatically assigned to your device when you access the internet)
- Images and related metadata (for example, when visiting our offices or attending an event)
- Content of your communications and files you input, upload, or create
- Videos (for example, when you provide a product testimonial)

We collect Personal Data in many ways, such as when you manually key in your Personal Data to our website forms or provide it to us or others from whom we receive marketing leads. From time to time, we offer virtual private networks (VPNs) for attendees at Origen Technologies events or visitors to our offices. If you access an Origen Technologies - provided VPN (virtual private networks), we may collect Personal Data from you, such as IP and MAC addresses, when we monitor the VPNs for security or performance.

IP addresses are also collected on an automated basis through your use of the website services using cookies, web beacons, and like technologies. We may infer your location from your IP address. When you make purchases through our website, we use third-party payment processors to collect credit cards or other financial information. Origen Technologies does not store the credit card information you provide, only confirmation that payment was made.

### **How We Use Information Collected from Interactions**

Origen Technologies uses the Information we collect from your Interactions to deliver services to you in accordance with our terms, to fulfill our contractual and legal obligations, or to “pursue legitimate business interests. We take seriously the need to balance our legitimate interests with your privacy rights. We summarize for you here how we use your Information, including Personal Data, to:

- Fulfill your orders or respond to your requests for information and other inquiries For example, to satisfy your requests for website materials such as marketing collateral or white papers, we collect and use your name and email address.
- Operate, enhance, and personalize your experience on our website We collect Information via cookies and other information gathering technologies to fulfill our legitimate interest in operating our website, making it easy to navigate, enriching the available content and offering information tailored to your interests. In doing so, we may receive your location information, which you can stop at any time by configuring the location setting permissions in your device.
- Issue your Origen Technologies accounts for access to online communities and forums and to enable your participation there. When you join our online communities and forums, including blogs and Origen Technologies -branded business communication and streaming platform channels (collectively, “online forums”), we collect your Personal Data to enable your access and provide an interactive experience when you participate. The guidelines associated with those online forums recommend not sharing private or proprietary information on them, as many of their aspects are public. If you choose to submit content to online forums, such content will be considered “public” and will not be subject to the privacy protections set forth in this Privacy Policy except as required by applicable law. Online

forums that display the Origen Technologies name but present you with their own privacy notice are subject to such privacy notice and not this Privacy Policy.

- **Send you administrative notices**

We may need to notify you (or we may choose to inform you) when we make updates to our terms or policies or make changes to our website services. We will use your name and email address to send such administrative notices to you, which due to their nature are treated differently from marketing communications for which you can opt out.

- **Manage your Origen Technologies account**

To perform the services under the contract between you and Origen Technologies, we need to collect certain Information from you such as your contact and payment details. Without this Information, we may not be able to deliver the services or comply with our contractual or legal obligations.

- **Advertise and market to you**

With your consent or to pursue legitimate business interests, we may contact you with product announcements, educational materials, announcements about exclusive offers, or information about upcoming or ongoing online/offline events, or .conf, and related offers. If required by applicable law, we will ask you for your consent before sending and/or give you the choice to opt out by sending an email to [marketing@origentech.com](mailto:marketing@origentech.com) of receiving these communications.

- **Administer prize promotions and events**

We use your Information to administer prize promotions and events based on the terms of the promotion or event. For example, if you enter a prize promotion, we may use your data to select a winner and provide the prize to you if you win. Or, if you register for a coding workshop or a gaming or other event, we may add your name to the list of expected attendees. If you win, we may seek your consent to announce you as a winner, with consent you may withdraw at any time. However, we will retain Information collected in connection with the enrollment contract.

- **Origen Technologies invite you to participate on customer advisory boards or in surveys, studies, and assessments of Offerings**

We use your Personal Data to register you to participate on advisory boards (such as our Customer Advisory Board or Product Advisory Council) or to request feedback from you about Origen Technologies Offerings. We use your feedback to fulfill our legitimate interest in improving our Offerings and growing our business. Your participation is voluntary and subject to the terms of your agreement with us and this Privacy Policy.

- **Diagnose and fix technical issues, monitor for security, and otherwise protect our property**

We do this to satisfy our legitimate interest in assessing actual or potential threats to our facilities, attendees at Origen Technologies-sponsored events, our IT systems and networks, and website services. We may process your Information, in particular your IP address, for this purpose.

- **To recruit you for a position at Origen Technologies**

We may use your username or handle and contribution information from Origen-managed repositories on third-party open-source platforms to fulfill our legitimate interest in identifying candidates for open positions at Origen Technologies.

- **Comply with law**

We may use your Information to comply with any applicable law, regulation, legal process, or governmental request, or to protect our legal rights or those of others.

- **For any other purpose disclosed to you in connection with our website services from time to time**

If we process your Personal Data for other purposes, we will provide you with information about such processing, and if required, obtain your consent.

## **Offerings**

We also collect Information, including Personal Data, when providing our Offerings. We may ask you for this Information directly, or in some cases, we may collect it when certain features are enabled. For example, we collect Information from or about you when you (or someone you work with):

- Order or sign up for a trial of our Offerings
- Interact with Origen Technologies online or offline, including when you request support services
- Use our Offerings to process information

## **What We Collect via Our Offerings and How We Use It**

We collect and process different types of product data (described below) when you deploy our Offerings to fulfil our contractual and legal obligations and operate our business or fulfil other legitimate interests. We work hard to help ensure a balance between our legitimate interests and your privacy rights.

- **License Usage Data** is Information that allows us to identify your on-premises account entitlements, such as license consumption, capacity, or type in our systems through an assigned license ID. We use this information to validate accounts and automate license verification.
- **Usage Data** is Information about your operating environment and configuration, user/product interactions, and sessions. This may include information about your network and systems architecture and configurations, OS and product versions, product configuration, applications installed, page loads and views, searches by number and type, errors, number of active and licensed users, source types and format

We use Usage Data to fulfil our contractual obligations in providing the Offerings to you and to fulfil our legitimate interest in supporting and enhancing them. For example, we may use this data to:

- Troubleshoot issues, provide support, and update our Offerings
  - Provide guidance to help you optimize your configuration, security, and usage of our Offerings
  - Better understand how our users configure our Offerings
  - Determine which configurations or practices optimize performance (e.g., best practices)
  - Benchmark key performance indicators (“KPIs”)
  - Recommend enhancements
  - Perform data analysis and audits
  - Identify, understand, and anticipate performance issues and the factors that affect them
  - Identify product security issues that may affect you and inform you of them
  - Improve and develop new features and functionality
  - Monitor the health, performance, and security of our Offerings
  - We hash or otherwise pseudonymize identifiable information connected to user activity for data analytics purposes.
- **Support Usage Data** includes License Usage and/or Usage Data as part of a customized support program that offers you accelerated troubleshooting, notices of patches/upgrades, tips to optimize usage, security, configurations and/or performance, and suggestions about other Offerings that may be of interest to you. The data is customer-identifiable so that we can help personalize your experience. From time to time, we may also use the Information to analyze usage trends, such as by data type, environment size, scale and architecture, and industry or sector, to develop and prioritize product enhancements (e.g., bug fixes or new features). However, this Information is essential for the operation of our cloud Offerings.
  - **Security Offerings Data.** Certain security-focused Offerings collect and, in some cases, allow sharing of Customer-submitted “artifacts” (such as logs, alerts, emails, cases, and incidents) and intelligence sources to support security investigation, threat detection and monitoring. In some cases, this Information may contain names, IP addresses, email addresses, phone numbers and other types of Personal Data contained in such artifacts and intelligence sources. You determine the extent and nature of the data you submit and whether to participate in such Offerings and in some cases to share the data with Origen Technologies. Participation in these services is voluntary.
  - **Certain Origen Technologies** offerings rely on automated methods of processing, such as artificial intelligence, which is a set of technologies and processes that allow computers to learn, reason, and assist in decision making. These technologies may consume Usage Data or other data you submit to the Offering that may be associated with you. The use of data in connection with such Offerings is set forth in the relevant terms.

## Other Collection Practices

We also collect Information from you to fulfill our contractual commitments to you. For example, we collect contact information such as name, address (email and physical) and phone number to enter you into our databases and manage your account. We also collect billing and payment information and information about Offerings, such as browser type, version number and OS, to administer your account, respond to customer service/support inquiries, and provide you with information about software updates via alerts or other “push” notifications. We do not sell this Information.

## Data Collection Practices Associated with Apps

The Origen Technologies Offerings are extendible using software applications commonly called “apps,” “add-ons,” “widgets,” or “technical add-ons”. We refer to these collectively as “Apps.” These Apps are versatile and have access to a broad set of web technologies that can be used to collect and use your Information. This Privacy Policy only applies to Apps built by or on behalf of Origen Technologies. It does not apply to Apps developed by others (“App Developers”) and available through Origen Technologies, third-party marketplaces, or repositories (e.g., AWS Marketplace, Google Play Store, and GitHub), or interoperable with Origen Technologies Offerings.

Origen requires App Developers to comply with applicable privacy and data protection laws but cannot guarantee that they do so. Before you use Apps created by App Developers, you should familiarize yourself with their privacy policies and license agreements.

Origen Technologies collects Information generated from the use and performance of Apps that interoperate with Origen Technologies Offerings, such as crash information, version, session duration, and user engagement (e.g., number of downloads, active/licensed users, and logins). We may share this data with App Developers so they can improve and enhance the performance of their Apps.

## How Origen Shares Your Information

Origen may disclose your Information to others in the following ways:

- **Subsidiaries.** We may disclose Information to our subsidiaries subject to this Privacy Policy so that they can help market, sell, and service our Offerings. Origen Technologies is the party responsible for the management of jointly used Personal Data. Origen Technologies maintains intragroup agreements covering the use of Personal Data within the Origen family of companies.
- **Service Providers.** We may disclose Information to our service providers (e.g., infrastructure as a service, order fulfillment, professional/customer/support services), pursuant to written agreements with confidentiality, privacy, and security obligations.
- **App Developers.** We may disclose Information about App use and performance with App Developers so that they can improve and enhance the performance of their Apps. With your consent, we may also disclose your Information to App Developers to help support the performance of their Apps. App Developers will be identified to you when you download and use their Apps pursuant to their license terms, including their privacy policies.
- **Partners and Sponsors.** We may disclose contact and account Information to our **partners** and event hosts/sponsors (identified at time of registration or event participation) pursuant to written agreements with confidentiality, privacy, and security obligations. They may use the Information to assess your interest in Origen Technologies Offerings, conduct user research and surveys, or send you marketing communications, subject to the terms of their privacy policies. We may also share Support Usage Data with partners when they manage your Offering for you.
- **Online Forums.** When you take certain actions on blogs and Origen-branded business communication and streaming platform channels (“online forums”) that are public or intended to be public in nature, such as when you broadcast content, participate in a chat room, post profile information, or follow a channel, that information may be collected, used, or disclosed by other participants in the online forums. In addition, some features of online forums are designed to provide others with information about user activity, such as the subscription status of users for a given channel.
- **Compliance and Safety.** We may disclose Information as necessary or appropriate under applicable laws (including laws outside your country of residence) to comply with legal process or requirements; respond to requests from public or government authorities

(including those outside your country of residence); enforce our terms and conditions; and protect our operations, rights, and safety, and that of you and others, as needed.

- **Merger, Sale, etc.** We may disclose Information in the event of a proposed or actual corporate or financing transaction, such as a reorganization, merger, sale, joint venture, assignment, transfer, or disposition of all or any portion of Origen Technologies business, assets, or stock (including Information regarding any bankruptcy or similar proceedings).
- **Other Users.** We may disclose Information to other users of the service in aggregated format, provided it does not include Personal Data. This may include “best practices” tips, KPIs, benchmarking data or other such aggregated information useful to the user community. For select Offerings, we may share Information you provide, such as security artifacts that may contain Personal Data (e.g., IP address) with other subscribers, but only if required as part of the Offering, as set forth in the relevant terms.

### **How We Secure Your Information**

Origen Technologies takes reasonable technical and organizational measures to safeguard Personal Data against loss, theft, and unauthorized access, disclosure, alteration, misuse, or destruction. If you have reason to believe that your Personal Data may no longer be secure (for example, if you feel that the security of an account has been compromised), please notify us immediately. If Origen Technologies learns of a breach of its systems, Origen Technologies may notify you or others consistent with applicable law and/or as agreed in our contract with you. Origen Technologies may communicate with you electronically regarding privacy and security issues affecting Information collected through your Interactions or use of our Offerings.

### **Origen Technologies Also Observes the Following Practices**

**Retention Period.** We retain your Information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or not prohibited by applicable law. Information you store in Origen technologies cloud environments are portable by you at the end of the term of your agreement with Origen Technologies. We retain your contract information for the duration of your agreement with us and thereafter as required or permitted by law. We keep a record of your data requests, including your requests to opt out of marketing communications, to honor them in the future.

**Use of Origen Offerings by Minors.** Origen Technologies' Offerings are not directed to individuals 16 and under or those not of the age of majority in your jurisdiction, and we request that these individuals, or others on their behalf, not provide us with their Information.

### **Lawful Basis for Transferring Your Data: Cross-border Transfers**

Your Personal Data may be stored and processed in any country where Origen Technologies, its subsidiaries, partners, and third-party service providers conduct business or host events. These locations may be outside of your country of residence, including in the United States, where different data protection laws may apply. When we transfer Personal Data, we implement safeguards for protection of the transferred Personal Data, such as standard contractual clauses. We put in place appropriate terms to protect your Personal Data in our agreements with our service providers.

### **Your Rights**

In certain locations, you may have rights under data protection law, such as to request access to or correction, deletion, or transfer of your Personal Data, or to object to or restrict Origen Technologies from using it for certain purposes. If you would like to exercise these rights, please submit your request, with a description of the nature of your request and the Personal Data at issue, via email to [operations@origentech.com](mailto:operations@origentech.com), and we will respond as soon as reasonably practicable consistent with applicable law. We will verify your identity before we comply with your request and ask for your cooperation with our identity verification process.

## **Protection Of Personal Data For Mexico**

On the occasion of the execution of this Agreement, the Parties understand the referral as the communication of Personal Data between the Licensor and the Licensee, within or outside the Mexican territory.

In compliance with the principles of purpose and responsibility contemplated by the LFPDPPP, the Licensee must protect the Personal Data of the owners (the "Owner"), establishing contractual clauses or other legal instruments, which provide for at least the same obligations to which the Licensor is subject.

The Submission of Personal Data will be formalized through the mechanism that the Parties establish in each case, as well as the conditions and systems that operate and allow Demonstrating

Any national or international Submission of Personal Data carried out by the Licensee to the Licensor may be carried out without the need to inform the Owner.

The Licensor, in its capacity as the person in charge of the Personal Data and in accordance with the provisions of article 50 of the LFPDPPP Regulations, is additionally obliged to:

To process Personal Data, including those of a sensitive nature that may be sent to it, in accordance with the instructions of the Licensee and with strict adherence to its Comprehensive Privacy Notice.

Implement the necessary administrative, physical and technical security measures in order to safeguard Personal Data to prevent unauthorized use and/or access, loss, destruction or violation of your digital environment, as well as the necessary measures to safeguard electronic and physical media at all times.

Refrain from processing Personal Data for purposes other than those established in the Licensee's Comprehensive Privacy Notice.

Maintain due confidentiality with respect to the Personal Data processed.

To comply with the foregoing, Licensor represents that it is aware of and understands the Comprehensive Privacy Notice as well as Licensee's Privacy Policy.

In the event that the Licensor processes the Personal Data, in contravention of the provisions of the LFPDPPP, or in the event that the National Institute of Transparency, Access to Information and Protection of Personal Data (the "INAI") verifies and/or rules such non-compliance, the Licensor will be the sole responsible for the processing of the personal data, and will assume the applicable sanctions and crimes, obliging itself to release the Licensee in peace and safety from any lawsuit, complaint, claim or judicial or administrative procedure filed by the Owner or its representative, as well as from the verification procedure and imposition of sanctions initiated by the INAI or from any other legal action derived from non-compliance with the applicable regulations.

The Licensee may carry out the controls and audits it deems appropriate to verify the Licensor's compliance with the provisions of the regulations on the protection of personal

data. In order to be able to exercise this right, the Licensee must first make the request to the Licensor at least 48 hours in advance and obtain the written acceptance of the Licensor.

## **Supplemental Terms and Conditions for Certain Regions**

### ***Europe***

We rely on a variety of legal bases to process Personal Data, including your consent, a balancing of legitimate interests, necessity to enter into and perform contracts, and compliance with a legal obligation. If we process your Personal Data based on your consent, you may withdraw your consent at any time. We will let you know if we are seeking to rely on your consent at the time of collection.

If you have any questions or concerns about Origen Technologies privacy practices, you can contact us at any time at [contact@origentech.com](mailto:contact@origentech.com)

### ***California***

- If you are a California resident, California law provides you with specific rights regarding your personal information, subject to certain exceptions, including the right to know about the personal information a business collects about you, the right to request that we delete the personal information we collect from you, and the right to non-discrimination for exercising your rights. For purposes of California law, personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or household.

- **Links to Other Parties**

Our Offerings may contain links to, or facilitate access to, other websites or online services. This Privacy Policy does not address, and Origen Technologies is not responsible for the privacy, information, or practices of other parties, including without limitation any App Developer, social media platform provider, wireless service provider, or device manufacturer. The inclusion of a link within the Offerings does not imply endorsement of the linked site or service by Origen Technologies. Origen Technologies encourages you to review privacy policies and learn about the privacy practices of the companies whose websites you choose to visit or apps you choose to use.

## **Contact Origen Technologies**

If you have any questions or comments about this Privacy Policy or Origen Technologies' privacy practices, you can contact us at any time at [contact@origentech.com](mailto:contact@origentech.com)

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