

**For information about COOKIES that may be used on ASI's or OpenWater's website -- how they work, why we use them and how you may manage them -- [click here.](#)**

*By visiting any ASI or OpenWater website or otherwise providing personal information to ASI or OpenWater via any other means, you accept and consent to the practices described in this Privacy Policy.*

## **Advanced Solutions International and OpenWater (an ASI company) PRIVACY POLICY**

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## Introduction

Advanced Solutions International, Inc. and its wholly-owned subsidiaries – Advanced Solutions International (Asia-Pacific) Pty Ltd, Advanced Solutions International-Canada Inc., and Advanced Solutions International (Europe) Limited (collectively, “ASI” or “we” or “us”) and all ASI affiliated companies, including Clowder, LLC (“Clowder<sup>TM</sup>”), OpenWater Software, LLC (“OpenWater”) and WBT Systems Limited (a private limited company in Ireland)–recognize the importance of protecting the privacy rights of the individual in relation to your personal information that can be used to personally identify you. This document is ASI’s and OpenWater’s Privacy Policy and explains how we collect, use, manage, disclose and transfer your personal information as part of our business activities, and explains your rights and choices regarding your personal information. In this Privacy Policy, personal information means information that is about you and which identifies you. ASI and OpenWater provide products and services to businesses for commercial purposes. We do not provide services to consumers for personal or household use.

We endeavor to apply suitable safeguards to protect your personal information as required by applicable privacy laws, including the Australian Privacy Principles, Canada’s Personal Information Protection and Electronic Documents Act and similar provincial privacy legislation, the UK’s GDPR and Data Protection Act 2018 and the EU’s General Data Protection Regulation effective on May 25, 2018, and U.S. state privacy laws. We will from time to time update this Privacy Policy as we undertake new personal data practices or adopt new privacy policies.

ASI and/or OpenWater are responsible for the processing of your personal information as described in this Privacy Policy, and we act as the controller of such personal information that we collect about you, meaning we determine the purpose for which your personal information is used and how we use it. The Privacy Policies of our affiliated companies, Clowder, LLC and WBT Systems Limited (a private limited company in Ireland), are described on their websites and may differ from ours.

**This Privacy Policy does not apply to the extent we process personal information in the role of a processor or service provider on behalf of our clients, including where our clients collect, use, share or process personal information of the clients’ employees, members and/or customers using our products or services. For detailed privacy information related to an ASI or OpenWater client who uses ASI or OpenWater products and services as a controller, please contact the client directly. We are not responsible for the privacy and data security practices of our clients, which may differ from our Privacy Policy. Nor does this Privacy Policy apply to the extent that we process personal information of job applicants, contractors or employees.**

## How we collect and use your personal information and the grounds for our use

We collect, use and disclose your personal information in order to provide products and services to you and/or your organization, to manage our relationship with you, to register and attend events, conferences or webinars, to carry out our obligations and enforce our rights arising under any contractual agreements entered into between you and us (including for billing and collection purposes), to respond to enquiries and provide information or advice about existing and new products or services, to market our services, including sending marketing communications with your consent, to provide you with access to protected areas of our website and notify you about changes to our website, to conduct product and market research, to improve our products and services, and to improve the quality of our client service.

Depending on the nature of your interaction with us, we may collect the following types of personal information from you: current and historical information about your name, contact details (including postal address, email address, telephone number, etc.), identification, organizational affiliations, profession or occupation, positions held, general organizational information, forms submitted, communication preferences, payment details, details of the products and services you have purchased from us or about which you have enquired, and any additional information relating to you that you have provided to us directly or indirectly through your access and use of our websites, by email or telephone, Technical Support, client surveys or conversations with our representatives or otherwise. We may also collect personal information from third parties including your organization and representatives, public sources, social networks, our related companies, authorized Solution Providers or authorized consultants, iMIS product partners and others who form a part of our sales and/or service network, information service providers, vendors and other service providers, and other parties with whom we exchange information to provide our products and services or to support our legitimate business interests.

### **Use of our website**

We may also collect information about your access and use of our website, including information about your computer and internet connection (e.g., IP address, operating system, browser type, device type) and details about your visits to our website (e.g., traffic and location data, logs and other communication data, and the resources you use and access on the website). We may also collect information that is not personal information because it does not identify you or anyone else, such as collecting anonymous answers to surveys or aggregated information about how users use our websites. We use this information to help us better suit our users' needs, to record and recognize users' cookie preferences, to deliver information requested, to register for events, and to analyze and improve our website and services.

### **What happens if you don't give us your information**

If you do not provide us with the requested information, we may not be able to provide the requested products or services or information to you, including information about discounts, sales or special promotions, and we may not be able to tailor the content of our websites to your preferences. As a result, your visit to our website may not be as useful or relevant as it could be if you did provide the requested information.

### **Sensitive Information**

We will not intentionally collect or maintain (and do not want you to provide) any "sensitive information," including information or an opinion about your or another individual's racial or ethnic origin, political opinions, membership in a political association or professional or trade association, philosophical or religious beliefs or affiliations, sexual preferences, criminal record, health or genetic information.

US residents: We will not intentionally collect or maintain any citizenship status information, biometric information, precise geolocation, social security or governmental identification, unless you consent. We only collect and process payment card information as necessary to provide products and services to you and we only share that information with third party payment processing providers to the extent necessary to provide those services.

After receiving your consent, we may capture audio or voice recordings associated with calls or meetings with our employees and contractors, and information that your share when you call or meet with us, for customer service, quality assurance and training purposes.

## **Consent**

From time to time we may seek your consent for a particular proposed collection, handling, use and disclosure of your personal information. You may withhold your consent to any or all such requests.

If you have consented to a particular purpose for our use and disclosure of your personal information, then we may rely on your consent until you withdraw it. You may withdraw your consent by contacting our representative to whom you originally gave your consent or by contacting us via the contact details provided in the “[How to contact us](#)” section below.

Your refusal to, or withdrawal of, consent may affect our ability to provide products, services and/or communications to you and/or your organization subject to the relevant consent.

## **Children’s Privacy**

This website is not designed to be of interest to children and we do not knowingly collect, solicit, keep or use any information provided by or relating to children under age 13. If you are under age 13, do not use any feature on this website or provide any information on this website. If we learn we have collected or received personal information from a child under age 13 without verification of parental consent, we will delete that information. If you believe that a child may have provided us with personal information without such parental consent, please contact us.

California consumers: We will not knowingly share the personal information of California consumers who are 16 years old or younger.

EU residents: We do not collect or process personal information of data subjects in the EU under the age of 16 without explicit consent from a parent or guardian. Our sites are not directed toward children.

## **Cookies**

A “cookie” is a small summary text file that is stored by your mobile phone (e.g., iPhone or Android) or by your browser (e.g., Internet Explorer, Chrome, Safari or Firefox). Cookies allow a website to store such things as user preferences, allowing the website to recognize a user and respond appropriately. OpenWater’s Cookie Policy for the OpenWater Platform is available at <https://help.getopenwater.com/en/articles/4534792-openwater-cookie-policy>.

When you access any ASI or OpenWater website, we may use cookies to help provide you with a better, more relevant and faster experience with us and our websites. There are several different types of cookies based on their use:

- Some cookies we use to remember your preferences for tools found on our websites, so you don't have to reenter them each time you switch a page or each time you visit. They will remember your user login, and other things such as what video streaming speeds you use. In some cases, the information used by cookies may be considered personal information if you are reasonably identifiable based on information readily available to us. Cookies on our

websites cannot be used to identify you personally unless: (a) you are signed in to our websites, (b) you complete a form on our websites, (c) you accept the use of cookies via our Cookie management tool where jurisdictions require such consent, or (d) you have not opted out of cookies in other jurisdictions.

- Some cookies are created and used by web analytics software (such as Google Analytics and Hubspot) to measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. We have enabled restricted data processing within Google Analytics and IP anonymization. These cookies cannot be used to identify you personally unless: (a) you are signed in to our websites, (b) you complete a form on our websites, (c) you accept the use of cookies via our Cookie management tool where jurisdictions require consent, or (d) you have not opted out of cookies in other jurisdictions. If you are logged in or you have completed a form, this process links you to your stored membership record that includes your username and email address and other personal information identified in the [“How we collect and use your personal information”](#) section above.
- We use reCAPTCHA APIs, a service provided by Google that helps protect websites from spam and abuse. A “CAPTCHA” is a turing test to tell human and bots apart. It is easy for humans to solve, but hard for “bots” and other malicious software to figure out. If you choose to use ReCAPTCHA, you acknowledge and understand that the reCAPTCHA API works by collecting hardware and software information, such as device and application data and the results of integrity checks, and sending that data to Google for analysis. The information collected in connection with your use of the service will be used for improving reCAPTCHA and for general security purposes. You can find further details at Google’s Privacy Policy, located at [Privacy Policy – Privacy & Terms – Google](#), and the [Google’s Privacy & Terms site](#), which apply to your use of ReCAPTCHA.
- Some cookies are used in analytics which may be able to identify what country, state or city you are in based on the information supplied by your browser when it requests a webpage. These cookies cannot be used to identify you personally, and are only used so we know where our website traffic comes from.
- When you register with us, we generate cookies that signal whether you are signed in or not. We use these cookies to determine which account you are signed in with, and if you should get access to a service. This also allows us to associate the actions you take on our websites with your account.
- Some cookies are used for directing advertisements and may be set through our site by our advertising partners, if you have accepted these cookies using our Cookie management tool where jurisdictions require consent, or you have not opted out of cookies in other jurisdictions. They allow us to know whether or not you've seen an advertisement or a type of advertisement, and how long it is since you've seen it. They are used to help target advertising so that you see more relevant advertising. These cookies do not store directly personal information - they store information about the content you are browsing, but not about who you are. Cookies of this type that are generated by third party advertisers have their own privacy policies, and we have no access to read or write these cookies. These third party advertising cookies may be used by those third parties to target advertising to you on other websites, based on your visit to our sites.
- On some of our pages, third parties may also set their own anonymous cookies, for the purposes of tracking the use of their application, or tailoring the application for you. These cookies will only be placed if: (a) they are strictly necessary for our website to function, (b) you have taken an action such as submitting a form, (c) you have accepted the use of cookies through our Cookie management tool where jurisdictions require consent, or (d) you have

not opted out of cookies in other jurisdictions. You can revoke your consent at any time by managing your cookie preferences for our websites.

A cookie, once placed, will enable us to greet you each time you visit our website without bothering you with a request to register and to keep track of your interest in particular products or services on our websites, which we may use to tailor the relevance of news we send you and to market our services, including sending marketing communications with your consent. We also use cookies to measure traffic and transaction patterns and to determine which website areas have been visited. We use this information to improve our online products and services and for analytical purposes, such as analyzing trends, administering our websites, tracking user movements and gathering broad demographic information.

You can manage your cookie preferences for our websites at any time using our Cookie management tool. If you do not wish to receive cookies, you can also set your browser or mobile device so that your internet-enabled device does not accept them. Most browsers and phones have a way to stop accepting classes of cookies, or to stop it accepting cookies from a particular website. You may find more information about cookies, including how to opt out of interest-based advertising, at [www.cookiesandyou.com](http://www.cookiesandyou.com).

If you are concerned about third party cookies generated by advertisers from Europe, you can turn some of these off by going to the [Your Online Choices](#) site.

### **Forums/Communities**

If you use our forums/communities, or post a message in a public place, you are giving consent for anyone to read, copy and republish your message or any part of it. When you join a forum/community, your email address and contact information is available to other forum/community members and anyone can use it to write to you, email you, or to add your contact information to their own distribution list. Forums also contain statistics and other information on your use of the forum, and this information is usually available to all forum members. We exercise no control over the use of any of this information.

### **Client Testimonials**

We post client testimonials and comments on our websites, including videos, which may contain personal information. We obtain each client's consent prior to posting the client's name and testimonial.

### **Other websites**

Our website may contain links to other websites that are outside our control and are not covered by this Privacy Policy. If you access other sites using the links provided, the operators of these sites may collect information from you that will be used by them in accordance with their privacy policy, which may differ from ours.

### **Prospect Sales Calls and Other Business Meetings**

We may utilize artificial intelligence technologies, such as Gong note taker or Teams, with your consent, to record sales calls with prospective clients and current clients as part of our sales process, to provide requested services, and for quality assurance, customer service, and training purposes. We do



not use any biometric information for identification or authentication purposes and we do not share this information with any other third parties other than the provider of the tool. We may utilize business tools, including Microsoft Copilot and Gong to take notes of meetings and other similar artificial intelligence powered tools as part of our business activities.

### **Direct marketing materials**

We may collect, hold, use and/or disclose your personal information to send you direct marketing communications and information about our products and services, as well as products and services offered by our related corporate affiliates – including Clowder, LLC, OpenWater Software, LLC and WBT Systems Limited - and our iMIS product partners, that we consider may be of interest to you. We may also share your personal data with our affiliated companies, which may send you direct marketing communications and information about their products and services that we consider may be of interest to you. These communications may be sent in various forms, including without limitation mail and email, in accordance with applicable marketing laws. Our direct marketing purposes are based on your consent. For example, when you contact us directly, provide us your business card or contact information, agree to receive communications after an event, and in similar circumstances. We may also rely on legitimate interests to contact you to offer related services that may be of interest to you based on the services that you may have bought from us or related to a resource or a demo that you have requested from us.

At any time you may opt-out of receiving marketing communications from us by using the opt-out facilities specified in our direct marketing communications or by contacting us via the contact details provided in the [“How to contact us”](#) section below. We will then ensure that your details are removed from the relevant marketing contact list from which you have elected to opt-out.

We may also disclose your personal information to our iMIS product partners for their direct marketing purposes, as described in the [“When and how we share your personal information”](#) section below.

### **When and how we share your personal information**

We may combine, share and exchange your personal information with and among our related corporate affiliates, including Advanced Solutions International, Inc. located in the United States, Advanced Solutions International (Asia-Pacific) Pty Ltd located in Australia, Advanced Solutions International-Canada Inc. located in Ontario, Canada, Advanced Solutions International (Europe) Limited located in the United Kingdom, Clowder, LLC located in the United States, OpenWater Software, LLC located in the United States and WBT Systems Limited located in Ireland, in an effort to assist ASI and its affiliated companies in managing, administering and providing products and/or services to you, and for marketing purposes. We may also combine, share and exchange your personal information with third-party service providers to ASI or its affiliated companies who perform functions on our behalf to support our websites, products and services. We may need to share your information with service providers to provide information about products and services to you, to improve our services provided to you, for developing and improving the product and services, and for providing customer service or support. These third-parties may include any third-party organizations involved in our sales and support network (including Solution Providers, iMIS product partners and authorized consultants); organizations maintaining or providing information technology services; organizations providing analysis and research; organizations involved in our business processing functions, including payment processing providers, or providing legal, management and administration services; organizations

providing cloud computing or data warehousing services; organizations that perform advertising or marketing-related services; website analytics providers; and suppliers or other third parties with whom we have commercial relationships for business-related purposes. These service providers are prohibited from using your personal information except for these purposes, and they are required to maintain the confidentiality of your personal information. Contracted service providers may also deliver artificial intelligence and generative artificial intelligence capabilities to analyze data and create AI-generated responses or other content as part of our business activities. A list of authorized iMIS product partners, Solution Providers and authorized consultants can be found in the [Partners](#) section of our website.

We may disclose your personal information to any third-party organization if we determine it is reasonably necessary to comply with a law, rule, regulation or governmental determination or decision; to protect any person from death or serious bodily injury; or to protect the rights, property or safety of ASI or OpenWater, our clients or others. This includes exchanging information with other companies and organization for the purposes of fraud protection and credit risk reduction. We may also disclose your personal information to any other third-party organization expressly authorized by you or for any other purpose disclosed by us when you provided the information.

Finally, we may disclose your personal information to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the assets of ASI or any of its subsidiaries or affiliated companies, whether as a going concern or as part of bankruptcy, liquidation or similar proceedings, in which personal information held by ASI or its subsidiaries or affiliated companies is among the assets transferred.

The third parties to whom we disclose personal information are generally located in, but not limited to, Australia, Canada, Ireland, the United Kingdom and the United States.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## **Transferring personal data from the EU and the UK to the US**

We are a global company with our headquarters in the United States and we have affiliated companies in the United States, the United Kingdom, Ireland, Canada and Australia. This means that personal information may be used, processed and transferred to the United States and other countries or territories and those countries or territories may not offer the same level of data protection as the country where you reside, including the European Economic Area. For this reason, ASI and OpenWater have self-certified compliance to the Department of Commerce that it adheres to the Data Privacy Framework Principles of the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework and the rights of EU and UK individuals and Swiss individuals as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and the United Kingdom and Switzerland to the United States. For more information about our Data Privacy Framework compliance, please see the [Supplemental Data Privacy Framework Policy section](#), below. ASI has also entered into Standard Contractual Clauses- Data Transfer Agreement with its affiliated companies regarding the transfer of personal data by ASI to the United States and to Australia.

ASI collects and transfers from the EU and the UK to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of ASI in a manner that does



not outweigh your rights and freedoms. ASI and OpenWater endeavor to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with ASI and OpenWater and the practices described in this Privacy Policy.

## **How to access and update your personal information; Your rights**

The European Union's General Data Protection Regulation, the United Kingdom's Data Protection Act 2018 and other countries' privacy laws provide certain rights for data subjects. A good explanation of them (in English) is available on the website of the United Kingdom's Information Commissioner's Office (<https://ico.org.uk/for-organisations/data-protection-reform/overview-of-the-gdpr/individuals-rights/the-right-to-be-informed/>).

In the U.S., some states have enacted privacy laws that provide certain rights for persons residing in those states, including the California Consumer Privacy Act (as amended by the California Privacy Rights Act of 2020) ("CCPA"). You may find more information about the rights granted to California residents under the CCPA here: <https://www.oag.ca.gov/privacy/ccpa>.

This Privacy Policy is intended to provide you with information about what personal information ASI and OpenWater collect about you and how it is used. If you have any questions, please contact us at [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or at [privacy@getopenwater.com](mailto:privacy@getopenwater.com) (for OpenWater).

If you wish to confirm that ASI or OpenWater is processing your personal information, or to have access to the personal information ASI or OpenWater may have about you, please contact us at [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or at [privacy@getopenwater.com](mailto:privacy@getopenwater.com) (for OpenWater), or by contacting us at the address or phone number provided in the **"How to contact us"** section below.

You may also request information (your right to know) about: the purpose of the collection and processing of personal information; the categories of personal information concerned; who else outside ASI or OpenWater might have received the personal information from ASI or OpenWater; what the source of the information was (if you didn't provide it directly to ASI or OpenWater); the business or commercial purpose for collecting, selling or sharing personal information; and how long it will be stored. If you are a California resident, you also have the right to know the specific pieces of personal information collected about you. You have a right to correct (rectify) the record of your personal information maintained by ASI or OpenWater if it is inaccurate. You may request that we erase the personal information or cease processing it, subject to certain exceptions. You may also request that we cease using your personal information for direct marketing purposes. In many countries, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how ASI or OpenWater processes your personal information. When technically feasible, we will, at your request, provide your personal information to you or transmit it directly to another controller.

You may request to access or update the personal information we hold about you by sending an email to [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or to [privacy@getopenwater.com](mailto:privacy@getopenwater.com) for (OpenWater), or by contacting us at the address or phone number provided in the **"How to contact us"** section below. In response to your request, we may ask that you confirm your identity and specify the information you wish to access so that we can quickly identify and retrieve the information for you and we will inform you how long it will take to provide or update the requested information. We will take reasonable steps to respond to such requests within thirty (30) days of receipt. Requests for access or correction should be made by using the contact details provided in the **"How to contact us"** section, below. To ensure the continued

confidentiality of your personal information, access may be provided at ASI's and OpenWater's office in Alexandria, Virginia; Austin, Texas; Toronto, Ontario; West Sussex, UK; or Melbourne or Sydney, Australia (where practicable) or you may elect to receive the information by registered mail. We will not charge you to make a request for access or to make a request for correction; we may, however, seek reimbursement from you for any reasonable expense incurred in retrieving, collating and forwarding the requested information to you or otherwise complying with your request. To the extent practicable, we will advise you in advance of those charges.

We may exercise our right to deny access to or correction of particular information in certain situations where permitted by law. If we deny your request we will provide in writing the reason why it was denied.

We will not unlawfully discriminate against you because you exercise any of your rights under the California Consumer Privacy Act (as amended by the California Privacy Rights Act of 2020).

## **Security of your information**

ASI and OpenWater use a range of security measures, including information access restrictions, designed to prevent the misuse, interference, loss, unauthorized access, disclosure, alteration or destruction of your personal information. We hold personal information in physical and electronic forms and store it at our own premises and with the assistance of service providers. The safety and security of your information also depends on you, and you are responsible for keeping confidential any passwords that provide access to certain parts of our website. We cannot guarantee the security of your personal information transmitted via the Internet to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our website.

***For hosted client data stored on our servers:* A client organization's files, databases and email that are hosted on ASI or OpenWater servers remain the property of the client organization. We will only access this information for troubleshooting purposes at the request of the client organization or to comply with our obligations under the applicable Hosting Agreement, Usage Agreement, Subscription Agreement, Master Services Agreement and/or other agreements with the client organization, which agreements also contain confidentiality and nondisclosure provisions binding both parties.**

## **Supplemental EU-U.S. Data Privacy Framework, UK Extension to the EU-U.S. Data Privacy Framework and Swiss-U.S. Data Privacy Framework Policy**

ASI and OpenWater comply with the EU-U.S. Data Privacy Framework ("EU-US DPF"), the UK Extension to the EU-U.S. Data Privacy Framework ("UK Extension") and the Swiss-U.S. Data Privacy Framework ("Swiss-U.S. DPF") and to the rights of EU and UK individuals and Swiss individuals as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and the United Kingdom and Switzerland to the United States. ASI and OpenWater have certified to the Department of Commerce that they adhere to the EU-U.S. DPF and the UK Extension, and the Swiss-U.S. DPF Principles ("DPF Principles") and to the rights of EU and UK individuals and Swiss individuals with respect to such information. If there is any conflict between the terms in this Privacy Policy and the DPF Principles, the DPF Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit <https://www.dataprivacyframework.gov>.

To view our supplemental Data Privacy Framework Policy, please visit [www.advsol.com/privacyframework](http://www.advsol.com/privacyframework).

ASI and/or OpenWater remain potentially liable under the DPF Principles if an agent processes Personal Data of EU and UK individuals and Swiss individuals covered by this DPF Policy in a manner inconsistent with the DPF Principles, except where ASI or OpenWater is not responsible for the event giving rise to the damage.

Adherence to the DPF Principles may be limited: (a) to the extent necessary to comply with a court order or meet public interest, law enforcement, or national security requirements, including where statute or government regulation create conflicting obligation; (b) by statute, court order or government regulation that creates explicit authorizations, which shall be limited to the extent necessary to meet the overriding legitimate interests furthered by such authorization; or (c) if the effect of the GDPR is to allow exceptions or derogations, under the conditions set out therein, provided they are applied in comparable contexts. ASI and OpenWater are required to disclose personal information in response to lawful requests by public authorities, including to national security or law enforcement requirements.

### **Data storage and retention**

Your personal information is stored by ASI on its servers, located in the United States, Canada, the United Kingdom and Australia, and by OpenWater on its servers located in the United States. We retain personal information for so long as necessary to provide our services to you and to fulfill the transactions you have requested, for a reasonable period of time for our legitimate business purposes, or for other essential purposes such as complying with our legal obligations, maintaining business and financial records, resolving disputes, maintaining security, detecting and preventing fraud and abuse, and enforcing our agreements. The criteria used to determine retention periods includes the legal limitation of liability period, agreed contractual provisions, applicable regulatory requirements, and industry standards. We retain personal information for the duration of the client's business relationship with ASI. For more information on where and how long your personal information is stored, please contact us at [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or at [privacy@getopenwater.com](mailto:privacy@getopenwater.com) (for OpenWater).

### **Changes and updates to the privacy policy**

By using the ASI or OpenWater websites, you agree to the terms and conditions contained in this Privacy Policy. We reserve the right to amend this Privacy Policy at any time, for any reason, including in order to comply with any future amendments to applicable privacy laws or regulations, by posting of the amended Privacy Policy. Any changes to this Privacy Policy will become effective upon our posting of the revised Privacy Policy on our websites. Your continued use of this website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. The provisions contained herein supersede all previous notices or statements regarding our privacy policies and practices that govern the use of this website.

### **How to contact us with privacy questions, concerns or complaints**

Please email [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or [privacy@getopenwater.com](mailto:privacy@getopenwater.com) (for OpenWater) if you would like to discuss the type of personal information we collect from you and the reason for the collection of such information. If you have further questions about privacy at ASI, please contact ASI's Data Privacy and Security Officer as set forth below:

In the United States: Advanced Solutions International, Inc.  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
Phone: (800) 727-8682 Email: [privacy@advsol.com](mailto:privacy@advsol.com)

In Canada: Advanced Solutions International-Canada Inc.  
251 Consumers Road, Suite 1200  
Toronto, Ontario M2J 4R3  
Phone: (800) 727-8682 Email: [privacy@advsol.com](mailto:privacy@advsol.com)

In the United Kingdom: Advanced Solutions International (Europe) Limited  
Basepoint Shoreham Business Centre, Little High Street  
Shoreham-by-Sea, West Sussex BN43 5EG  
Phone: +44 (0) 2032 670067 Email: [privacy@advsol.com](mailto:privacy@advsol.com)

In Australia: Advanced Solutions International (Asia-Pacific) Pty Ltd  
(ABN 39 060 645 445)  
Suite 221, 189 Queen Street  
Melbourne VIC 3000  
Phone: +613 9869 7500 Email: [privacy@advsol.com](mailto:privacy@advsol.com)

If you have further questions about privacy at OpenWater, please contact Jocelyn Dyer or Kunal Johar as set forth below:

In the United States: OpenWater Software, LLC  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
Phone: (202) 765-0247  
Attention: Jocelyn Dyer or Kunal Johar  
Email: [privacy@getopenwater.com](mailto:privacy@getopenwater.com)

### **If you have a privacy complaint**

We are committed to resolving your privacy complaint as quickly as possible and has procedures in place to help resolve any problems or complaints efficiently. If you have a concern or complaint about privacy at ASI or OpenWater, please contact us at the contact information provided above.

To comply with the General Data Protection Regulation (2016/679) ASI and OpenWater have appointed a European representative. If you wish to contact them, their details are as follows:

Bird & Bird GDPR Representative Services SRL  
Avenue Louise 235  
1050 Bruxelles  
Belgium  
[EUrepresentative.ASI@twobirds.com](mailto:EUrepresentative.ASI@twobirds.com)

If you are located in Australia and are not satisfied with the resolution of your complaint by ASI or OpenWater, you may contact the Office of the Australian Information Commissioner at:

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Tel: 1300 363 992

Post: GPO Box 5218 Sydney NSW 2001

In compliance with the DPF Principles, ASI and OpenWater commit to resolve complaints about our collection or use of your personal information. EU and UK individuals and Swiss individuals with inquiries or complaints regarding our Data Privacy Framework Policy should first contact ASI at [privacy@advsol.com](mailto:privacy@advsol.com) or OpenWater at [privacy@getopenwater.com](mailto:privacy@getopenwater.com). ASI and OpenWater are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) with respect to the EU-U.S. DPF and the UK Extension, and the Swiss-U.S. DPF. Under certain circumstances, EU and UK individuals and Swiss individuals may invoke binding arbitration before the Data Privacy Framework Panel. See for additional information: <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>. ASI's and OpenWater's independent recourse mechanism for EU-U.S. DPF and the UK Extension, and the Swiss-U.S. DPF complaints for use by EU and UK individuals and Swiss individuals is JAMS, at <https://www.jamsadr.com/DPF-Dispute-Resolution>.

ASI has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office ("ICO") with regard to unresolved EU-U.S. DPF and the UK Extension complaints concerning human resources data transferred from the EU and the UK in the context of the employment relationship. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs and the UK ICO for more information or to file a complaint. The services of EU DPAs and the UK ICO are provided at no cost to you.

#### **Additional disclosures for California residents**

This section applies to you only if you are a California resident.

The California Privacy Act (as amended by the California Privacy Rights Act) requires businesses to disclose whether they sell or share personal information with third parties. As a business covered by the CCPA, we do not sell personal information. We may share personal information (in the form of identifiers and internet activity information) with third party advertisers for purposes of targeting advertisements on third party websites, applications and services. In addition, we may allow third parties to collect personal information from our sites or services if those third parties are authorized service providers who have agreed to contractual limitations as to their use, disclosure and retention of such personal information, or if you use ASI or OpenWater sites or services to interact with third parties to direct us to disclose your personal information to third parties.

You have the right to opt out of the sale or sharing of your personal information. For more information on how to exercise your rights, see the [How to access and update your personal information; your rights](#) section of this Privacy Policy. You may exercise this right using the Cookie management tool for advsol.com [go here](#), and imis.com [go here](#), and for OpenWater, [go here](#). You may also opt-out of targeted advertising by sending an opt-out preference signal supported by your device or browser. Your use of an opt-out preference signal will apply only to your device or browser and not to other consumer information that is not linked to your device or browser.

We endeavor to respond to a privacy rights request within the required timeframe. If we need more time, we will inform you of the reason and extension period in writing. If we do not take action on your privacy rights request within the 45 days response period, or in the event of an extension, within the

maximum 90-day response period, we will inform you in writing of the reasons for not taking action, as well as provide an explanation of any rights you have to appeal the decision.

#### *Authorized Agents*

You may designate an authorized agent to make a request on your behalf subject to proof of identity and written authorization. Requests made through an authorized agent should be made by email at [privacy@advsol.com](mailto:privacy@advsol.com) (for ASI) or at [privacy@getopenwater.com](mailto:privacy@getopenwater.com) (for OpenWater), or via phone at 800-727-8682. As part of our verification process, we may request that the agent provide, as applicable, proof concerning his or her status as an authorized agent. In addition, we may require that you verify your identity or confirm that you provided the agent permission to submit the request. We will respond to your request consistent with the CCPA.

**Last Updated: November 25, 2024**

*We may change this Privacy Policy from time to time, including in order to comply with any future amendments to applicable privacy laws or regulations. Any changes to this Privacy Policy will become effective upon our posting of the revised Policy on our websites. Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.*