

## **OneStream Privacy Policy**

Effective: April 12, 2019

Updated: May 13, 2021

OneStream Networks, LLC and its subsidiaries (collectively “OneStream”) respect your privacy and are committed to protecting your Personal Information and being transparent about how we collect, use, and share your Personal Information. This Privacy Policy (“Policy”) applies to this website or to any website that includes a link or reference to this Policy (“Website”) and describes how we handle Personal Information (as described below) and the choices available to you regarding collection, use, access and how to update and correct your Personal Information.

This Privacy Policy also covers our collection, use and disclosure of Personal Information that we collect through our service platform. The use of information collected through our service is limited to the purpose of providing the service for which our client has engaged OneStream.

### **EU-U.S. / United Kingdom / Swiss – (U.S. Privacy Shield)**

OneStream Networks, LLC participates and complies with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework(s). Privacy Shield 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/or Switzerland, as applicable to the United States in reliance on Privacy Shield. OneStream is committed to subjecting all Personal Information received from European Union (EU) member countries United Kingdom and Switzerland, in reliance on the Privacy Shield Framework, to the Framework’s applicable Principles. OneStream Networks, LLC has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

OneStream is responsible for the processing of Personal Information it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. OneStream complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU and Switzerland, including the onward transfer liability provisions.

With respect to Personal Information received or transferred pursuant to the Privacy Shield Framework, OneStream is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, OneStream may be required to disclose Personal Information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

OneStream is committed to cooperate with EU data protection authorities (DPA's) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with advice given by such authorities regarding human resources data transferred from EU and Switzerland in the context of the employment relationship.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>.

Under certain conditions, more fully described on the Privacy Shield website <https://www.privacyshield.gov/article?id=How-to-Submit-a-Complaint>, you may be entitled to invoke binding arbitration when other dispute resolution procedures have been exhausted.

### **Personal Information we collect**

We collect data, including Personal Information that you provide on our Website and as you use the Website or Services. "Personal Information" includes information that can be used to identify you as a natural person, directly or indirectly, in particular in combination with other information available to us such as an identification number, online identifier or one or more factors specific to your identity as a natural person and may include your:

- name,
- address,
- phone number,
- e-mail address (etc.),
- billing information (such as credit card number)
- call detail records (CDR's)

Each visitor to the Website may be identified by cookies or similar technologies (see below) as well as by an IP address during their visit. The information we collect depends on how you use our Website. We also collect Personal Information from trusted third-party sources and engage third parties to collect Personal Information to assist us.

We and third parties we engage may combine information we collect from you over time and across our Website with information obtained from other sources. This helps us improve the information's overall accuracy and completeness, and also helps us better tailor our interactions with you.

OneStream aims at keeping the Personal Information we hold is accurate and up to date. Please ensure that the Personal Information you communicate to us is accurate and up to date.

If you fail to provide certain Personal Information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a product or service), or we may be prevented from complying with our legal obligations.

### **How we use your Personal Information.**

We only collect, use and store your Personal Information for the purposes of operating our business, delivering, improving, and customizing our Website as well as products and services we provide, sending marketing and other communications related to our business, providing you with information, products and services that you request from us, and for [other legitimate purposes permitted by applicable law]. As the case may be, we will provide you with the basis of such legitimate purposes upon its occurrence, prior to implementation of the related processing.

OneStream collects Personal Information for a variety of purposes, as follows:

- Performance of a contract to which OneStream is a Party;
  - Providing you with our product(s) or service(s) upon your request;
  - Respond to an inquiry from you or sending communications to you for marketing or customer survey purposes, either directly from OneStream or from our third-party partners;
  - Providing you with customer service and support;
  - Personalize the Website and advertising thereon; and
  - Improving the operation of the Website and/or help adjust the content of the Website to the general geographic location of you and for reporting purposes.

Where required or permitted by applicable law, we also use or disclose your Personal Information to limited third parties when we believe, in good faith, that such use or disclosure is reasonably necessary to (i) comply with the legal obligation (such as to comply with a subpoena or other legal process) bearing on OneStream, (ii) enforce or apply the terms of any agreement to which we are a party, or (iii) protect the rights, property or safety of OneStream, OneStream's clients, or others.

### **How we share your Personal Information**

We may share your personal Information with our affiliate entities and other third-party business partners, providers, vendors or contractors acting on our behalf and under our instructions, whether located inside and outside of the UK, European Union ("EU") or the Economic Area ("EEA"), for the purposes of operating our business, delivering, improving, and customizing our Website as well as our products and services, sending marketing and other communications related to our business [, and for other legitimate purposes permitted by applicable law or otherwise,] and when needed, with your consent.

Therefore, we may share Personal Information in the following ways:

- Within OneStream and any of our affiliate entities located inside or outside of the UK, EU/EEA, for purposes of data processing or storage;

- With OneStream’s business partners, vendors, authorized third-party agents or contractors to provide our products and services or facilitate transactions. Examples include, but are not limited to: processing orders, hosting websites and providing support. These companies are authorized to use your Personal Information only as necessary to provide these services to us, pursuant to written instructions. In such cases, these companies must abide by our data privacy and security requirements and are not allowed to use Personal Information they receive from us for any other purpose.
- In connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by another company. In such an event, you will be notified via email and/or a prominent notice on our website of any change in ownership, incompatible new uses of your Personal Information, and choices you may have regarding your Personal Information.
- As the case may be, for further protection of your privacy, OneStream will share your Personal Information in aggregated and/or de-identified form that cannot be used to identify you.

Where mandated or permitted by applicable law, regulation or legal process, we will disclose your Personal Information to law enforcement officials, government authorities or other third parties, located inside and outside of the UK, EU/EEA, where such disclosure is in accordance with due process of law and binding upon OneStream, to the extent necessary to comply with legal process or meet national security requirements, protect the rights, property, or safety of OneStream, its business partners, you, or others.

### **Transfer, processing, and storage of Personal Information**

As a global organization with affiliated entities located inside and outside of the UK, EU/EEA and business processes in operation across borders, we may transfer your Personal Information to OneStream’s headquarters in the United States of America, to any OneStream affiliate entity worldwide or to third-party business partners, providers, vendors, or contractors, that are located inside or outside of the UK, EU/EEA, for purposes described in the section “How we share your Personal Information” above, including for the purpose of data processing or storage on behalf and under the control of OneStream.

OneStream implements cross-borders transfers in compliance with applicable privacy and data protection regulations, including Regulation (EU) 2016/679 of 27 April 2016 on the protection of Personal Information (“GDPR”). Where mandated by applicable law, to ensure that your Personal Information does receive an adequate level of protection, OneStream implements the appropriate measures to ensure that your Personal Information is treated across OneStream affiliated entities and by the aforementioned third parties in a way that is consistent with and which respects the applicable privacy and data protection laws. Measures include the following:

## **Cookies and Similar Technologies**

We and our service providers use cookies and similar technologies to collect information that helps us improve the quality of our sites and services and the online experience of our visitors and users, to analyze trends, administer the website, tracking users' movements around the website, and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual and aggregated basis.

Most web browsers support cookies, and users can control the use of cookies at the individual browser level. Please note that if you choose to disable cookies, it may limit your use of certain features or functions on our sites and services.

## **Log Files**

As is true of most websites, we gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp, and/or clickstream data. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality link this automatically collected data to other information we collect about you.

## **Advertising Choices and Control**

As described in this Privacy Policy, third parties may use cookies and similar tracking technologies to collect information and infer your interests for interest-based advertising purposes. If you would prefer to not receive personalized ads based on your browser or device usage, you may generally express your opt-out preference to no longer receive tailored advertisements by clicking <http://optout.networkadvertising.org>. Please note that you will continue to see advertisements, but they will no longer be tailored to your interests.

## **Links to third-parties' websites**

The Website may contain links to third-party websites that are operated by companies outside of our control. Your activities on those third-party websites will be solely governed by the privacy policies and procedures of those third parties. OneStream takes no responsibility whatsoever for the content or information practices of such third parties and encourage you to review the privacy policies of these third parties before disclosing any information on their websites.

## **Security and confidentiality of your Personal Information**

The security and confidentiality of your Personal Information is important to us. We implement appropriate physical, administrative, and technical measures and safeguards designed to protect your Personal Information from loss, theft, misuse, alteration, unlawful or unauthorized access, use, or disclosure.

OneStream also relied on reasonable measures to safeguard Personal Information in our possession, including:

- Enforcement of group-wide policies and procedures on Personal Information use, security, and confidentiality.
- Restricting access to Personal Information to only those employees and third-party service providers on a “need to know” basis and under strict confidentiality requirements.
- Use of technologies to safeguard data during transmission, such as SSL encryption for some of the data that you provide via the Website and using appropriate security measures to safeguard the data we collect and possess.
- Use of industry-standard measures and processes for detecting and responding to inappropriate attempts to breach our computer systems and networks.

The Internet and any communication thereon cannot be guaranteed to be secure at all times, and we cannot ensure or warrant the security of any Personal Information you provide us through this technology. In this regard, we have procedures to deal with any suspected data security breach and will notify you and any regulator of a suspected breach where we are legally required to do so. If you have questions about the security of your Personal Information, or if you have reason to believe that the Personal Information that we hold about you is no longer secure, please contact us immediately as described in this Privacy Policy.

### **Retention of Personal information**

We will retain your Personal Information as well as Personal Information that we process on behalf of our clients for only as long as needed to fulfill the purposes for which it is collected. We will retain and use your Personal Information as necessary to comply with our business requirements, legal obligations, resolve disputes, protect our assets and enforce agreements to which OneStream (or any of our affiliate entity) is a party.

For more information about the retention periods, please contact us using the contact details provided in this Privacy Policy.

### **Your Rights**

OneStream respects your control over your information, and upon request, we will confirm whether we hold or are processing information that we have collected from you. You also have the right to access, free of charge, obtain a paper or electronic copy, review, correct and update all your Personal Information stored by us, notably to confirm its accuracy. Subject to any relevant legal requirements and exemptions, you may also oppose to or limit the processing of your Personal Information or request that certain of your Personal Information be deleted from our files.

If you reside within the EU, you may also exercise your right to portability of your Personal Information where the lawful basis for the processing is (i) (a) a contract or (b)

your consent and (ii) by automated means. Please note that such a request could be limited to the sole Personal Information you provided us with or that we hold at that given time and subject to any relevant legal requirements and exemptions, including identity verification procedures.

OneStream will make reasonable efforts to comply with the aforementioned requests, unless such requests are prohibited by law, or there is a legitimate purpose to retain your Personal Information, in which case we will inform you without undue delay. We reserve the right to verify your identity before any request relating to your Personal Information processed by us. Please direct any questions about your Personal Information using the contact details provided at the end of this Policy.

Any individual who wishes to opt out can do so freely and at any time by contacting OneStream at using the contact details provided at the end of this Policy, further to the information process relating to the new purpose or clicking on the link within each of our marketing communications.

### **Information Related to Data Collected through the Service Platform**

OneStream collects information under the direction of its clients and has no direct relationship with the individuals whose Personal Information it processes. In situations where OneStream, acting as a processor on behalf of and under the instructions of one of its clients (acting a data controller), receives Personal Information pertaining to individuals residing in the EU and Switzerland directly from our clients (and not the individual to whom the Personal Information relates), we will cooperate with our clients' reasonable requests to:

- Assist them in informing the impacted individuals about (a) the possibility that we may disclose such individuals' information to third parties and (b) the individual's ability to opt out of such disclosures (except for disclosures to third parties performing tasks directly on our behalf and pursuant to our instructions), transfers to subsequent third parties are covered by the service agreements with our clients; and
- Reasonably ensure that we process the information for purposes compatible with the purposes for which it was originally collected or subsequently authorized by the impacted individuals. After we have notified our clients, they will then inform us if any individuals have opted out of such disclosures.
- Acknowledge that you have the right to access your Personal Information. An individual who wishes to no longer be contacted by one of our clients that use our service or seeks access, or to correct, amend, or delete inaccurate data should direct his query to the OneStream's client (the data controller). If requested to remove data, we will respond within a reasonable timeframe.

### **Children's Privacy**

OneStream encourages parents and guardians to take an active role in their children's online activities. OneStream does not sell or offer its products and services to children. As such, our Websites are designed for adult user interaction. We do not intentionally collect Personal Information from children under the age of 18 If you are a parent or

legal guardian of a minor under the age of 16 and believe that the minor has disclosed personal information to us, please contact us using the contact details provided in this Privacy Policy.

### **Choice and Opt-Out**

Subject to your choices, we may also send you marketing communications via email. In addition to the “unsubscribe” link contained in each of our e-mail marketing communications, you may opt-out freely and at any time of receiving OneStream newsletters or other e-mail marketing communications from OneStream by sending an e-mail to [optout@onestreamnetworks.com](mailto:optout@onestreamnetworks.com)

We may send you service communications relating to the products or services we provide you via email (e.g. to inform you about changes to the product or service you requested from us, revisions of our terms and conditions or this Policy). As such service communications are necessary for the purposes of providing you with our products or services or complying without legal obligations, you will not be able to opt-out from receiving them.

### **Updates to this Policy**

We reserve the right to update this Privacy Policy from time to time in order to reflect any changes to our products or services or to comply with changes in our legal and/or regulatory obligations. We will post the revised version on the Website, with an updated revision date. Where such changes to our Privacy Policy are substantial, we will also notify you by other means prior to the changes taking effect, such as by sending you an email notification. By continuing to use our website thirty days after such revisions are in effect, you will be deemed to accept and agree to the revisions and to abide by them.

### **Contact**

If you have any question or would like to enquire about OneStream’s privacy practices, the use of your Personal Information, or about this Policy, please contact us at:

**OneStream Networks LLC**

Attn: Privacy Officer

Address: 500 Lee Rd., Suite 300, Rochester, NY 14606

Email: [privacy@onestreamnetworks.com](mailto:privacy@onestreamnetworks.com)

Phone: +1.585.563.1549

If you are not satisfied with our answer or the way we process your Personal Information pursuant to this Privacy Policy, you may also have the right to lodge a complaint with a data protection authority or a Court of competent jurisdiction. If you reside within the European Union, a list of national data protection authorities can be found here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)