

Silk Privacy Notice

Introduction

We, at Silk (the “**Company**”, “**we**”, “**us**”, “**our**”), respect the privacy and data protection rights of our website visitors, business contacts and actual and potential customers.

This Privacy Notice (the “**Notice**”) describes the personal information we have and the policies and procedures we use regarding personal information, in each of the following contexts –

1. Through our website silk.us (the “**Website**”).
2. When you subscribe to our newsletters or access our webinars.
3. When you visit us at trade shows and conferences.
4. About representatives of our existing and prospective customers, reseller partners, and vendors (the “**Representatives**”).

We are committed to complying with applicable data protection laws, including the EU and the UK General Data Protection Regulation (GDPR).

This Notice may be amended from time to time. We will post any change to this Notice on our Website a reasonable time in advance of the effective date of the change, and we will also make efforts to proactively notify you by email of the changes to the Notice if we have your email address.

Contact us

If you have any questions, comments or concerns regarding this Notice or our processing of your personal information, please contact us at privacy@silk.us

What we collect and why

Scenario	Purposes	Categories of information processed
You contact us with an inquiry through the Website contact-us form or chatbot	To contact you to promote our business and market our products and services	Email address and content of inquiry.
You subscribe to our newsletters	Send you our newsletter to promote our business and market our products and services	Email address
You scan your badge at our booth in a conference or trade shows in which we present	To contact you to promote our business and market our products and services	Name, title, company, email
You ask to access a webinar or other expert content we offer	To contact you to promote our business and market our products and services	Email address, and optionally: name, job title and company.
You complete a LinkedIn form expressing interest in our products and services	To contact you to promote our business and market our products and services	Name, title, work email and phone number, company name
We conduct a marketing call with you	To promote our business and market our products and services	Name, title, company, phone number, recordings of marketing calls with you.

We track how you interact with marketing content we send you over email (only if you are based in the United States)	Analyze how users interact with our content, to improve how we promote our business and market our products and services.	How and when you viewed the email content, clicked linked, or completed forms.
We receive your contact information from data brokers, or from a marketing call with one of your colleagues who provides your information to us.	To contact you to promote our business and market our products and services	Name, title, company, email
You voluntarily provide a video testimonial	To promote our business and market our products and services	Name; company; title; recorded testimonial
We receive your information when you purchase one of Silk's products or services from us, or through one of our reseller partners	Administering the business and support/professional services relationship with you as a customer. Providing customer support and professional services to you.	Name; company; title; phone number
We engage in a business relationship with a vendor or service provider which you are a representative of	Administering the business relationship with vendors and service providers Facilitating Silk's use of vendors and service provider's products and services	Name, email address, company, position, phone number, country, communication exchanged with you.
Use of essential cookies on the Website	Facilitate a website feature that the user specifically requested	IP address, pages visited, Website functions used, fields completed in forms.
Use of non-essential cookies on the Website	Analyze site usage to evaluate and improve its performance, improve user experience on the site, inform and serve personalized ads more relevant to user interests	IP address, pages visited, Website functions used, fields completed in forms.

Methods and sources for collecting your personal information

We collect the personal information from several sources:

- Directly from you when you provide it to us through email communications, a form, you scan your badge at our booth in a conference or trade shows in which we present, you speak with us in a marketing call, you provide a video testimonial.
You are not legally obligated to provide us your personal information, but if you do not, we will not be able to handle or respond to your inquiry, maintain our business contact with you, or fulfill your request to register to our webinar, conference, or newsletter.
- From data brokers
- From one of our reseller partners, if you are a Representative of an organization that purchased one of Silk's products or services.
- If another Representative of your organization provides us with your information.
- Through the device you use to access our Website, such as in our use of cookies.

Sharing your personal information

We will not share your information with third parties, except in the events listed below or when you provide us with your explicit and informed consent. We do not sell your personal information to third parties.

Scenario	Purposes	Examples of Third parties involved
We will share your personal information with our service providers who assist us with the internal operations of our business and the Website. These companies are authorized to use your personal information in this context only as necessary to provide these services to us and not for their own promotional purposes.	Operating the Website and our business	Hubspot, Salesforce.com, Microsoft, Salesloft, Zoom, Docusign, Magentrix, OpsGenie, Highspot.
You voluntarily provide a video testimonial	To promote our business and market our products and services	Website visitors viewing your testimonial on our Website
Providing support relating to hardware components manufactured by others	Providing customer support and professional services to you	TD Synnex
If you abused your rights to use the Website or violated any applicable law while doing business with us.	Responding to, handling, and mitigating suspected violations of law in connection with our business.	Competent authorities, legal counsels, and advisors.
If a judicial, governmental, or regulatory authority requires us to disclose your information.	Complying with a binding request from a competent authority.	Competent authorities.
If the operation of the Website or our business is organized within a different framework, or through another legal structure or entity (such as due to a merger or acquisition).	Enabling a structural change in the operation of the Website and our business.	The target entity of the merger or acquisition, legal counsels, and advisors.
Third party cookies	For more details, see the cookie banner we have on the landing page of our Website.	

Data retention and security

We retain your information for the duration we need it to operate the Website and our business, and interact with customers, reseller partners, and suppliers, and thereafter as needed for record-keeping matters.

We will retain your information for the duration needed to support our ordinary business activities operating the Website and interacting with existing and potential customers, suppliers, and reseller partners. Thereafter, we will still retain your personal information as necessary to comply with our legal obligations, resolve disputes, establish, and defend legal claims and enforce our agreements. The overall period of retention is approximately 7 years.

We implement measures to secure your information

We implement measures to reduce the risks of damage, loss of information and unauthorized access or use

of information. However, these measures do not provide absolute information security. Therefore, although efforts are made to secure your personal information, there is no guarantee that it will be immune from information security risks.

Additional information for individuals in the EEA or UK

Controllers

The following companies in the Silk group are the separate controllers of your personal data

Location	Name	Address
United States	Silk Technologies, Inc.	75 Second Avenue, 6th Floor, Suite 620, Needham, MA 02494, United States
United Kingdom	Silk Technologies UK LTD	37 Broadhurst Gardens, London, England, NW6 3QT

International data transfers

To facilitate processing your information within the companies in our corporate group and by our service providers, we will transfer your information to countries such as the United States, United Kingdom, and Israel. We do so under the terms of a data transfer agreement which contains standard data protection contract clauses with adequate safeguards determined by the EU Commission and UK Information Commissioner's Office.

Legal basis for processing your personal data

Purpose or Scenario	Legal Basis
You contact us with an inquiry through the Website contact-us form or chatbot	Legitimate interests in developing potential leads and responding to business inquiries
You subscribe to our newsletters	Consent
You scan your badge at our booth in a conference or trade shows in which we present, and we contact you to promote our business and market our products and services	Consent
You ask to access a webinar or other expert content we offer, and we contact you to promote our business and market our products and services	Legitimate interests in developing potential leads
You complete a LinkedIn form expressing interest in our products and services	Consent
We conduct a marketing call with you	Legitimate interests in developing potential leads
We record our marketing call with you	Consent
We receive your contact information from data brokers, or from a marketing call with one of your colleagues who provides your information to us.	Legitimate interests in developing potential leads
You voluntarily provide a video testimonial	Consent

We receive your information when you purchase one of Silk's products or services from us, or through one of our reseller partners	Legitimate interests in administering relationship with customers using Silk's product and services
We engage in a business relationship with a vendor or service provider which you are a representative of	Legitimate interests in administering contractual obligations with vendors
Use of essential cookies on the Website	Legitimate interests in the proper operation of the website
Use of non-essential cookies on the Website	Consent
Responding to, handling, and mitigating suspected violations of law in connection with our business	Legitimate interests in defending and enforcing against violations and breaches that are harmful to our business
Complying with a binding request from a competent authority	Legitimate interests in complying with mandatory legal requirements imposed on us
Enabling a structural change in the operation of the Website and our business	Legitimate interests in our business continuity

Data subject rights

If you are in the EEA or the UK, you have the following rights under the GDPR:

Right to Access and receive a copy of your personal information that we process.

Right to Rectify inaccurate personal information we have concerning you and to have incomplete personal information completed.

Right to easily and at any time withdraw your consent to us processing your personal data in the instances that are based on consent as described in the table above. The withdrawal of consent will not affect the lawfulness of processing based on consent before its withdrawal.

Right to Data Portability, that is, to receive the personal information that you provided to us, in a structured, commonly used, and machine-readable format. You have the right to transmit this data to another person or entity. Where technically feasible, you have the right to have your personal information transmitted directly from us to the person or entity you designate.

Right to Object to our processing of your personal information based on our legitimate interest. However, we may override the objection if we demonstrate compelling legitimate grounds, or if we need to process such personal information for the establishment, exercise, or defense of legal claims.

Right to Restrict us from processing your personal information (except for storing it): (a) if you contest the accuracy of the personal information (in which case the restriction applies only for a period enabling us to determine the accuracy of the personal information); (b) if the processing is unlawful and you prefer to restrict the processing of the personal information rather than requiring the deletion of such data by us; (c) if we no longer need the personal information for the purposes outlined in this Notice, but you require the personal information to establish, exercise or defend legal claims; or (d) if you object to our processing based on our legitimate interest (in which case the restriction applies only for the period enabling us to determine whether our legitimate grounds for processing override yours).

Right to be Forgotten. Under certain circumstances, such as when you object to our processing of your personal information based on our legitimate interest and there are no overriding legitimate grounds for the processing, or if you withdraw consent to processing that was based on your consent (and there is no other legal basis for processing), you have the right to ask us to erase your personal information. However, notwithstanding such request, we may still process your personal

information if it is necessary to comply with our legal obligations, or for the establishment, exercise, or defense of legal claims. If you wish to exercise any of these rights, please contact us through the channels listed in this Notice.

When you contact us, we reserve the right to ask for reasonable evidence to verify your identity before we provide you with information. Where we are not able to provide you with information that you have asked for, we will explain the reason.

Subject to applicable law, you have the right to lodge a complaint with your local data protection authority. If you are in the EU, then according to Article 77 of the GDPR, you can lodge a complaint to the supervisory authority, in the Member State of your residence, place of work or place of alleged infringement of the GDPR. For a list of supervisory authorities in the EU, click [here](#).

If you are in the UK, you can lodge a complaint to the Information Commissioner’s Office (ICO) pursuant to the instructions provided [here](#).

Additional information for individuals in the United States

Below is the information we have collected about you in the past 12 months.

We do not sell your personal information and have not done so in the past 12 months. We also do not use or disclose sensitive personal information.

Categories of personal information	Specific types of personal information collected	Business purposes for which the information is used
Identifiers	Name, email address.	<ul style="list-style-type: none"> • Providing customer service
Other information that identifies, relates to, describes, or is capable of being associated with, the individual	Phone number, country	<ul style="list-style-type: none"> • Processing or fulfilling orders and transactions, verifying information, processing payments, auditing related to a current interaction with you
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Products and services used or expressed interest in, communications with you and content of your inquiry.	<ul style="list-style-type: none"> • Detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity • Undertaking internal research for technological development and demonstration. • Undertaking activities to verify or maintain the quality of the service and to improve, upgrade or enhance the service.
Professional information	Company affiliation, position, Participation in conferences or trade shows	<ul style="list-style-type: none"> • Auditing related to a current interaction with the consumer and concurrent transactions, including, but not limited to counting ad impressions to unique visitors,
Audio and video information	Recordings of marketing calls with you Recorded testimonial	

Internet or other electronic network activity information	IP address, pages visited, Website functions used, fields completed in forms, How and when you viewed content, clicked linked, or completed forms in emails.	verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards • Debugging to identify and repair errors
Inferences	Preferences regarding Silks' professional and product content	

Sharing and Disclosing to third parties

The chart below explains the personal information we disclosed in the preceding 12 months. It also explains about the personal information we share for online behaviorally targeted ads in the preceding 12 months. Other than this, we have not disclosed your personal information for a business purpose in the preceding 12 months.

We do not have actual knowledge that we share the personal information of consumers under 16 years of age for online behaviorally targeted ads.

Categories of personal information	Categories of third parties to whom we disclose your information and the specific business or commercial purpose for the disclosure
Identifiers	<ul style="list-style-type: none"> • With TD Synnex, to provide customer service relating to hardware components manufactured by others • Competent authorities, legal counsels, and advisors if you abused your rights to use the Website or violated any applicable law while doing business with us. This is to protect against malicious, deceptive, fraudulent, or illegal activity. • Judicial, governmental, or regulatory authority if they require us to disclose your information. This is to protect against malicious, deceptive, fraudulent, or illegal activity. • Target entity of the merger or acquisition, legal counsels, and advisors If the operation of the Website or our business is organized within a different framework, or through another legal structure or entity. This is to improve, upgrade or enhance the service
Other information that identifies, relates to, describes, or is capable of being associated with, the individual	
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	
Professional information	
Audio and video information	
Internet or other electronic network activity information	
Video information	
Internet or other electronic network activity information;	Sharing with advertising networks for online behaviorally targeted ads.
Inferences	

Your rights under state privacy laws in the U.S.

Knowing the personal information we collect about you

You have the right to know whether we are processing your personal information. If we do, you have the right to know the following information, which we will provide to you after we receive your request and verify your identity:

- The categories of personal information we collected about you.
- The categories of sources from which the personal information was collected.
- The purposes for which we collect personal information.
- The categories of third parties with whom we share personal information.
- The specific pieces of personal information we collected about you.

Right to obtain portable copy of your personal information

If your data is available in a digital format, you have the right to obtain a copy of the personal information that you previously provided to us, in a portable and readable format (to the extent this is technically feasible).

Right to correct information

If we receive a verifiable request from you to correct your information and we determine the accuracy of the corrected information you provide, we will correct inaccurate personal information that we maintain about you.

In determining the accuracy of the personal information that is the subject of your request to correct, we will consider the totality of the circumstances relating to the contested personal information.

We also may require that you provide documentation if we believe it is necessary to rebut our own documentation that the personal information is accurate.

We may deny your request to correct in the following cases:

- We have a good-faith, reasonable, and documented belief that your request to correct is fraudulent or abusive.
- We determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.
- Conflict with federal or state law.
- Another exception to state privacy laws.
- Inadequacy in the required documentation
- Compliance proves impossible or involves disproportionate effort.

We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to correct your information

Right to deletion

Subject to certain exceptions set out below, on receipt of a verifiable request from you, we will:

- Delete your personal information from our records; and
- Direct any service providers to delete your personal information from their records.

Please note that we may not delete your personal information if it is necessary to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.
 - Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
 - Debug to identify and repair errors that impair existing intended functionality.
 - Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.
 - Comply with the applicable Electronic Communications Privacy Act.
 - Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the ability to complete such research, provided we have obtained your informed consent.
 - Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information.
- or
- Comply with an existing legal obligation.

We also will deny your request to delete if it proves impossible or involves disproportionate effort, or if another exception applies under privacy laws.

We will provide you a detailed explanation that includes enough facts to give you a meaningful understanding as to why we cannot comply with the request to delete your information.

Protection against discrimination

You have the right to not be discriminated by us for exercising the rights granted to you under applicable law. If you exercise your rights, we cannot:

- Deny you services.
- Charge different prices or fees for services, also through discounts, benefits, or fines.
- Provide you with a different level or quality of services.
- Propose that you receive different prices or tariffs for services.

Please note that we may charge a different fee or provide a different level or quality of services, if the difference is reasonably related to the value we gain from your personal information.

Exercising your rights

If you would like to exercise any of your rights as described in this Notice, please contact us through the channel indicated in the "Contact Us" section at the beginning of this Notice.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal data requested to you, by using a two or three points of data verification process, depending on the type of information you require.

Note you may appoint an authorized agent to file requests to exercise your rights on your behalf. To this end, you must provide your authorized agent with written approval to do so. The authorized agent will

have to present us with proof, attesting that you authorized them to act on your behalf. Furthermore, we will require verification of your identity, as explained above.

Our response to your requests

We will respond to your requests within 45 days (or within 90 days, where the law permits, and we determine it necessary considering the complexity and number of the requests you have filed). If we take longer than 45 days, we will inform you of the extension within the initial forty-five-day response period, together with the reason for the extension.

We may deny your request in the following cases:

- If we believe in good faith, based on reasons which are documented in writing, that your request is fraudulent or is an abuse of your rights under applicable law.
- If we conclude that the request is irrelevant, based on all the circumstances at issue (e.g., if you requested the correction of your personal information, and we find that it is likely to be accurate).
- If it is contrary to federal or state law.
- Due to discrepancy in the required documentation.
- If the fulfilment of your request turns out to be impossible or involves disproportionate effort.

We will provide you with a detailed explanation including sufficient facts, to enable you to meaningfully understand why we cannot fulfil your request.