RheoSense, Inc., the U.S. corporation, complies with the EU-U.S. Privacy Shield Framework set forth by the U.S. department of Commerce regarding the collection, use, and retention of Personal Data (as defined below) from European Union member countries. RheoSense, Inc. has certified that it adheres to the Privacy Shield Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Resource, Enforcement, and Liability. If there is any conflict between the policies in this RheoSense Privacy Shield Policy, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification page, please visit https://www.privacy.shield.gov.

Definitions

Type of personal data collected: All data on www.RheoSense.com will be collected via a web form located on various pages of our website. The personal data collected will be limited to, email, phone number, company information, and visitor information.

Privacy Shield Principles

RheoSense, Inc. commits to subject to the Privacy Shields' Principles all Personal Data received by RheoSense, Inc. in the U.S. from European Union member countries in respective to the Privacy Shield framework.

Purpose of data collection: to further educate those who are interested in viscosity, rheology, and improving their research.

Enforcement: In compliance with the Privacy Shield Principles, RheoSense, Inc. commits to resolve complaints about your privacy and our collection or use of your personal data. Data subjects with inquiries or complaints regarding this Privacy Shield Policy should contact RheoSense at <u>US-Privacy@RheoSense.com</u>.

Independent recourse mechanisms: In compliance with the Privacy Shield Principles, RheoSense, Inc. commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact *RheoSense, Inc.* at:

Grace Baek | Graceb@rheosense.com | (925) 866-3808

RheoSense, Inc. has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning data transferred from the EU.

Third Parties: RheoSense, Inc. will transfer only personal data covered by this Privacy Shield Policy needed for an agent to assist RheoSense with a requested product or service. All agents must have the same level of privacy protection required by the Privacy Shield Principles. Upon receiving a written notice from an agent that it can no longer meet its obligation to provide the same level of protection as required by the Privacy Shield Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing.

This will include conditions in which requirement to disclose personal information in response to lawful requests by public authorities arises in instances to meet national security or law enforcement requirements.

Access Personal Data: Data subjects whose personal data is covered by the Privacy Shield Policy will have the right to access Personal Data to correct, amend, or delete personal data that is inaccurate or have been processed in violation of the Privacy Shield Principles.

Dispute Resolution Body: RheoSense's participation in the EU-U.S. Privacy Shield Framework is subject to investigation and enforcement by the Federal Trade Commission.

We would like to inform you that:

- o You have the right to access your personal data
- o the choices and means RheoSense, Inc. offers individuals for limiting the use and disclosure of your personal data
- o RheoSense, Inc. being subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC)
- o the possibility, under certain conditions, for the individual to invoke binding arbitration
- o the requirement for RheoSense, Inc. to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements
- o your organization's liability in cases of onward transfers to third parties

Changes to Policy: With the requirements of Privacy Shield, the policy may be amended from time to time. Notices appropriate to the situation will be given.