

## Synchronoss Website Privacy Statement

This website privacy statement ("**Privacy Statement**") explains how Synchronoss Technologies, Inc. ("**Synchronoss**", "**we**", "**us**" and "**our**") may collect, use, store and disseminate information obtained from users ("**Personal Data**") of its website, <http://www.synchronoss.com> (the "**Site**"), and the content and services available at the Site and offered by Synchronoss (taken together, the "**Services**"). This Privacy Statement also describes your rights regarding the use of your Personal Data where the EU General Data Protection Regulation ("**GDPR**") applies for [you](#).

Your privacy is very important to us and we pay close attention to how information about our visitors is used and shared.

Click a link below for further information on each topic:

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### 1. Personal Data Collected

#### A. Personal Data we collect and process

##### i. Engagement with our Services

We obtain various types of Personal Data when providing our Services. Such Personal Data may include contact information such as names, addresses, phone and fax numbers, and email addresses; information about products and services ordered or provided; and information collected related to gauge interest in Internet-based e-commerce capabilities or provide technical literature or product demos.

***ii. Device Information***

When using the Site or availing of services related to the Site, Personal Data will be collected from you by Synchronoss. This includes information about:

- Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data to analyze trends in the aggregate and administer the site. We do not link this automatically collected information to other Personal Data we collect about you.

**B. Personal Data you can choose to share with us**

***i. Query and Form Information***

At your election, you may desire to subscribe or gain access to various information services concerning Synchronoss' products, services, user groups and business. When you do so, our registration process may require you to provide your name, company name, address, telephone number, email address and certain additional information, such as, for example, your preferred contact method and product markets of interest to you. You may also share Personal Data when contacting us and submitting enquiries through the Site or by filling in the contact form on the Site.

***ii. Blogs and Testimonials***

You may choose to give us additional information such as your name, gender, address and email address when you write a blog for our Site or provide a testimonial.

**C. Personal Data we obtain from third parties**

***i. Candidate Profile Information***

We obtain information such as your name, gender, address, email address, university education, professional qualifications, previous employment and other details when

applying for vacancies advertised on the Site and creating a Candidate Profile on the website of our employment partner iCIMS.

**ii. Consumers of our Clients**

Synchronoss provides a wide variety of services and solutions to its business clients (“**Clients**”) that facilitate services related to the online provisioning and activation of network and home-based services. If you are a Consumer of one of our Clients, please [click here](#) to read Section 14 of this Privacy Statement.

**2. How and Why we use your Personal Data**

The following table details the legal basis for (the "**Legal Basis**") and the reasons why ("**Purposes**") we process your Personal Data:

<b>LEGAL BASES &amp; PURPOSES</b>	
<b>Performance of a Contract</b>	
<b>Legal Basis</b>	It is necessary to process your Personal Data to enter into and perform our contract with you as part of our Services.
<b>Purposes</b>	<p><b>Enter into and Perform our Contract with you</b></p> <ul style="list-style-type: none"> <li>• To provide cloud computing infrastructure services.</li> <li>• To fulfill orders.</li> <li>• To process payments.</li> <li>• To provide customer services.</li> </ul>
<b>IMPORTANT</b>	You are obliged to provide us with your Personal Data as it is necessary to enter into a contract with us, for our Services. In the event that you do not wish to provide us with your Personal Data for the above purposes, you will not be able to avail of our Services.

## Legitimate Interests

### **Legal Basis**

It is necessary for the purpose of our legitimate interests to collect and process your Personal Data where we have a legitimate interest to do so as part of your engagement with our Site and Services.

### **Purposes**

#### **Improving Site Functionality & Efficiency**

- To provide, improve, test and monitor the effectiveness of the Site.
- To monitor metrics such as total number of visitors, traffic data and demographic patterns.

#### **To respond to your Queries or Requests**

- To respond to your inquiries for information and to provide additional information according to your preferences.

#### **Candidate Profile**

- To process and to respond to applications submitted via your Candidate Profile.

#### **Investor Relations**

- To provide information about Synchronoss investor relations, stock information and annual and quarterly reports.
- To facilitate Synchronoss' relationship with investors.

#### **Promotional or Marketing materials**

- To process your Personal Data to send you information about Synchronoss and its products, services and business partners.

	<ul style="list-style-type: none"> <li>• At your election, at any time, you may choose to stop receiving future marketing communications from Synchronoss by sending an e-mail to <a href="mailto:opt-out@synchronoss.com">opt-out@synchronoss.com</a> or clicking the [unsubscribe] link in communications you receive.</li> </ul> <p><b>Blogs and Testimonials</b></p> <ul style="list-style-type: none"> <li>• To process and maintain the blogs and testimonials on our Site.</li> </ul> <p><b>Improve Synchronoss Services</b></p> <ul style="list-style-type: none"> <li>• To better our services offering through online surveys and focus groups.</li> <li>• To provide and process satisfaction surveys, policy surveys and referral forms.</li> </ul>
<p><b>IMPORTANT</b></p>	<p>Before we process your Personal Data to pursue our legitimate interests for the above purposes, we determine if such processing is necessary and we carefully consider the impact of our processing activities on your fundamental rights and freedoms. On balance, we have determined that such processing is necessary for our legitimate interests and that the processing which we conduct does not adversely impact on these rights and freedoms.</p> <p><b>If the GDPR applies for you, you have a number of rights in relation to your Personal Data which are set out in Section 13. In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests.</b></p>

## Compliance with a Legal Obligation

<b>Legal Basis</b>	It is necessary to process your Personal Data in order to comply with legal obligations to which we are subject.
<b>Purposes</b>	We obtain, collect and process your Personal Data in order to comply with the following legal obligations: <ul style="list-style-type: none"><li>• To comply with applicable company and tax law.</li><li>• To comply with all other applicable laws.</li></ul>

### 3. Sharing of Personal Data

In certain situations, Synchronoss may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. Synchronoss may also disclose personal information if (1) reasonably necessary to perform the Service, (2) permitted under this Privacy Statement or (3) Synchronoss is required to do so by law or regulation, or in the good faith belief that such action is necessary to (i) conform or comply with any legal, regulatory, law enforcement, bankruptcy proceedings, or similar requirement or investigation, (ii) protect or defend the rights or property of Synchronoss or any other user or (iii) enforce the [Terms of Use](#) or other terms that are applicable to the Service.

Synchronoss may disclose Personal Data to some or all of the following recipients:

<b>RECIPIENT(S)</b>
<b>Synchronoss and group companies of Synchronoss ("Synchronoss Group")</b> <ul style="list-style-type: none"><li>• Members and shareholders of the Synchronoss Group</li><li>• Internal business units within the Synchronoss Group.</li></ul>
<b>Third Party Service Providers</b> <ul style="list-style-type: none"><li>• Joint venture partners</li><li>• Social media companies</li></ul>

- Public relations agencies
- Customer relation management companies
- Resellers of Synchronoss Products
- Distribution partners of Synchronoss
- Device insurance providers
- Third party logistics providers
- Wireless, wireline and cable service providers
- Mobile device management providers
- Merchant banks
- Credit verification services
- Address validation services
- Website analytics providers
- Other carefully selected service providers or partners

#### **Other Recipients**

- Prospective buyers of business assets (to facilitate the acquisition of Synchronoss or a substantial portion of Synchronoss assets by a third party)
- Regulatory authorities and law enforcement agencies (where we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request)
- External advisors e.g. lawyers, accountants and auditors (as necessary to protect Synchronoss' legitimate and legal interests).

If Synchronoss is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Site of any change in ownership or uses of your Personal Data, as well as any choices you may have regarding your Personal Data. In the event we so disclose personal information to third parties, we require these third parties to use your personal information only as necessary to help us perform the Service. Synchronoss may transfer Personal Data to any successor to all or substantially all of its business or assets that concerns the Service. We will share your personal information with third parties only in the ways that are described in this Privacy Statement.

#### **4. Transfers of Your Personal Data**

Synchronoss has global hosting centers that store and process your Personal Data in various locations around the world including in the United States and the European Economic Area ("EEA").

We only transfer your Personal Data outside the EEA where the European Commission has decided that the third country in question ensures an adequate level of protection in line with EU data protection standards or there are appropriate safeguards in place to protect your Personal Data.

Where we transfer Personal Data to other entities within the Synchronoss Group, we do so on the basis of Standard Contractual Clauses which are a form of data processing contract approved by the European Commission. You can find a copy of these clauses [here](#).

For further information, please contact our Privacy Officer [privacyofficer@synchronoss.com](mailto:privacyofficer@synchronoss.com).

## **5. Security**

The security of your Personal Data is important to us. We follow generally accepted standards to protect the Personal Data submitted to us, both during transmission and once we receive it. Information collected by Synchronoss is stored in secure operating environments that are not made generally available to the public. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. However, we are committed to taking reasonable and appropriate steps to protect your Personal Data that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. If you have any questions about the security of your personal information, you can contact us at [privacyofficer@synchronoss.com](mailto:privacyofficer@synchronoss.com).

## **6. Third Party Sites**

The Site may contain links to other websites ("**Third Party Sites**") on the Internet, and other websites may contain links to the Site. Third Party Sites are not under Synchronoss' control. The privacy and security practices of Third Party Sites are not covered by this Privacy Statement, and Synchronoss is not responsible for the privacy or security practices or the content of Third Party Sites. We recommend that you familiarize yourself with the privacy policies and practices of Third Party Sites.

## **7. Tracking Technologies**

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, operating system, date/time stamp, and/or clickstream data to



analyze trends in the aggregate and administer the site. We do not link this automatically collected data to other information we collect about you.

Synchronoss and our partners such as Google Analytics which is our marketing analytics service provider and YouTube for video hosting and AddThis for content sharing use cookies or similar technologies in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may request reports based on the use of these technologies by our marketing analytics service provider partners on an individual as well as aggregated basis.

We use cookies for marketing analytics. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

## **8. Widgets and Social Media Features**

Widgets support functions that require that you disclose certain personal information given the user's choice of participation. This information is collected in many different ways such as: forms, surveys, contests, forums, subscribing or unsubscribing to mailings and correcting or updating personal information and are only used for the purpose in which they were collected.

Our Site includes social media features such as the Facebook Like button and Widgets such as the Share this button and also interactive mini-programs ("**Social Media Features**") that run on our Site. Our Social Media Features may collect your IP address, information about which page you are visiting on our Site, and may set a cookie to enable the Social Media Features to function properly.

Social Media Features and Widgets are either hosted by Third Party Sites or hosted directly on our Site. Your interactions with Social Media Features on Third Party Sites are governed by the privacy policy of the relevant Third Party Site. We recommend that you familiarize yourself with the privacy policies and practices of Third Party Sites.

## **9. Behavioral Targeting/ Re-Targeting**

Our third party partners may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide

you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#) (or if located in the European Union click [here](#)). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

## **10. Data Retention**

We expect to keep your Personal Data for as long as is necessary for the purposes for which it was obtained from the date of collection. Once we have determined that we no longer need to hold your Personal Data, we will delete it from our systems. For example, we may hold your data if we are processing an ongoing claim or believe in good faith that the law or a relevant regulator may reasonably in our view expect or require us to preserve your Personal Data.

## **11. Blogs and Testimonials**

If you use a bulletin board or, blog on this Site, you should be aware that any Personal Data you submit there can be read, collected, or used by other users of these forums, and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums. To request removal of your personal information from our blog or forum, please contact us at our contact details set out in Section 16. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

We also have testimonials on our site which display personal information. The individuals who have provided these testimonials have given permission to have their personal information and testimonial displayed. If you wish to update or delete your testimonial, you can contact us.

## **12. User Access and Choice**

You may elect to not receive future marketing communications from Synchronoss by sending an email to [opt-out@synchronoss.com](mailto:opt-out@synchronoss.com) that includes your electronic mail address; provided, Synchronoss reserves the right to use your contact information to send you important information (such as, for example, information about products and services that you have acquired from Synchronoss or information about changes to this Privacy Statement).

Upon request Synchronoss will provide you with information about whether we hold any of your Personal Data. If you wish to have access and correct,

update or delete inaccurate data, please [contact us](#). We will respond within 1 month of your request. We may extend this up to 2 months if necessary however we will inform you if this arises.

### 13. Rights under the EU General Data Protection Regulation ("GDPR")

If the GDPR applies for you, you have a number of rights in relation to your Personal Data which are set out in section 13. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for our legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by us about you and to access the information which we hold about you. We will only charge you for making such an access request where we feel your request is unjustified or excessive.
Right to Rectification	You have the right to have any inaccurate Personal Data which we hold about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see below) and we do not have an overriding reason to process your Personal Data or if we no longer require your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask us to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data we hold about you is inaccurate or our use of your information is unlawful. If you validly exercise this right, we will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request us to provide you with your Personal Data which you have given us in a structured,

	commonly used and machine-readable format and you may request us to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) we process your Personal Data with your consent or where it is necessary to perform our contract with you; <b>and</b> (2) the processing is carried out by automated means.
<b>Right to Object</b>	<p>You have a right to object at any time to the processing of your Personal Data where we process your Personal Data on the legal basis of pursuing our legitimate interests.</p> <p><b>Please note that you may opt-out of receiving marketing information from us by contacting us at <a href="mailto:opt-out@synchronoss.com">opt-out@synchronoss.com</a></b></p>

You can exercise any of these rights by submitting a request to our Privacy Officer in writing [privacyofficer@synchronoss.com](mailto:privacyofficer@synchronoss.com).

We will provide you with information on any action taken upon your request in relation to any of these rights without undue delay and at the latest within 1 month of receiving your request. We may extend this up to 2 months if necessary however we will inform you if this arises. Please note that we may ask you to verify your identity when you seek to exercise any of your data protection rights.

You also have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator. For further information please see [here](#).

#### **14. The Consumers of our Clients**

Synchronoss provides a wide variety of services and solutions to our business clients (“**Clients**”) that facilitate services related to the online provisioning and activation of network and home-based services. Synchronoss develops systems to interface with our Clients’ online order capture systems and receives information for each order about the individual that placed the order (“**Consumer**”). In all instances, Synchronoss will obtain

access to Personal Data about Consumers ("**Consumer Personal Data**") in the course of fulfilling the order and or services offered on our Client's website. Consumer Personal Data may include, name, address, phone, bank account number, social security number, credit status, email address, credit or bank card number, billing history and other information, depending on the particular Client and application at issue. We also supplement data such as credit verification status and address validation services.

Wherever we obtain access to Consumer Personal Data, we are acting as a **data processor** on behalf of our Clients, and we therefore conduct such activities strictly in accordance with their instructions and pursuant to our contractual arrangements with them. If you are a Consumer with an existing relationship with one of our Clients, you should refer to the Client's website to understand their privacy practices and policies. Where the GDPR applies for you and you would like to access and review your Consumer Personal Data, you should contact our Client with any such requests. We will cooperate as appropriate with requests from our Clients to assist with such requests.

## **15. Revisions and Updates to the Privacy Statement**

If we decide to change our Privacy Statement, we will post those changes to this Privacy Statement, the home page, and other places we deem appropriate so that you are aware of what Personal Data we collect, how we use it, and under what circumstances, if any, we disclose it. Personal Data collected by the Site is subject to the Privacy Statement in effect at the time of use. We reserve the right to modify this Privacy Statement at any time, so please review it frequently. If we make material changes to this policy, we will notify you here, or by means of a notice on our home page prior to the change becoming effective.

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

## **16. Questions about this Privacy Statement**

If you have any questions regarding this Privacy Statement or your dealings at this Site, or a request to correct or delete personal information, please contact please contact our Privacy Officer:

**Synchronoss Technologies, Inc.**

Attn: Privacy Statement  
200 Crossing Boulevard  
8th Floor  
Bridgewater, NJ 08807  
USA

**Tel:** (866) 620-3940

**E-Mail:** [privacyofficer@synchronoss.com](mailto:privacyofficer@synchronoss.com)

We will use commercially reasonable efforts to fulfill your request in a timely manner.

*Last Updated May 24, 2018*