

## **Pipes Tracker Website Privacy Policy**

*Last modified: 9/23/24*

Solvaire Technologies, L.P., ("Solvaire") is committed to protecting your privacy. This Website Privacy Policy (the "Policy") outlines the data collection practices used by Solvaire in connection with your use of the Pipes Tracker website (the "Website"), including the types of information that Solvaire may collect from you or that you may provide when you visit the Website.

This Policy applies to any information that directly or indirectly identifies an individual or which, when combined with other information, allows an individual to be identified ("Personal Information"), that is collected on the Website, or through any online or in-person events relating to training, marketing, or recruiting. This Policy does not apply to Personal Information collected by any unaffiliated websites or services that link to or are accessible from the Website. This Policy does not replace or override any terms directly established between you and Solvaire.

Please read this Policy carefully to understand Solvaire's policies and practices regarding the handling of your information. If you do not agree with these policies and practices, you should not use the Website. By accessing or using the Website, you agree to be bound by this Policy. Solvaire may change this Policy from time to time in its sole discretion. If you continue to access or use the Website after any such changes, you will be deemed to have accepted the changes. It is your responsibility to check this Policy periodically for updates.

### **1. What Solvaire Collects and Why**

Solvaire collects and processes several categories of Personal Information, which is generally publicly available information, of individuals, who visit or use the Website, or otherwise interact or engage with Solvaire or the Website (the "Users"). The categories include (a) information provided directly to Solvaire by Users; and (b) information collected by automated processes.

#### **a. Information Provided by You**

Solvaire may collect Personal Information directly from Users interacting with Solvaire through the Website, or by phone, email, regular mail, or in-person. This information may include the User's first and last name and email address, company name, company contact first and last name, company physical address, and company email address for the purposes of requesting further communication with Solvaire.

#### **b. Information Collected Automatically**

Solvaire collects Personal Information using automated technologies which enables us to collect the standard information your browser sends to websites that you visit, such as your IP address, browser type and language, referring/exit pages, and links you click within the Website. This information may include:

- Internet protocol (IP) address
- Browser type
- Language
- Internet service provider
- Referring/exit pages
- Platform type

- Time/date stamp
- Number of clicks on Website
- User search history, search terms

## **2. How Solvaire Uses Personal Information**

Solvaire uses the Personal Information collected:

- To provide the Website.
- To confirm or verify a User's identity.
- To communicate with Users.
- To process and respond to support requests.
- To comply with legal and regulatory requirements applicable to Solvaire's business and internal policies for maintaining records.
- To comply with court orders and legal processes, and to enforce Solvaire's Terms of Use and this Policy.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- For any other legal or business purpose that complies with the practices described in this Policy.

## **3. Basis for Collection**

Solvaire collects information for a variety of reasons. Generally, Solvaire's purpose for collecting Personal Information varies by circumstance, and may include one or more of the following reasons: (a) You have consented to the collection; (b) collecting your information is necessary for you to effectively use the Website; and/or (c) Solvaire has a legitimate interest in collecting and processing your information that is not overridden by your data protection interests or rights.

## **4. Disclosure of Your Information**

Solvaire does not intend to disclose your Personal Information in connection with your normal use of the Website to anyone except those identified in this Policy. Solvaire may disclose, without restriction, aggregated information about Users and/or information that does not identify any individual.

Solvaire may disclose Personal Information:

- To Solvaire's subsidiaries and affiliates.
- To contractors, service providers, and other third parties that Solvaire uses to support its business and who Solvaire will use commercially reasonable efforts to ensure are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which Solvaire discloses it to them.
- 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 Solvaire's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Solvaire about its users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- In response to a lawful request by public authorities, including to meet national security or law enforcement requirements.
- With your consent.

Solvaire will never sell, rent, trade, or lease your information, and will only use your information as identified in this Policy.

## 5. Log Files

Solvaire's web servers use log files to analyze trends, administer the Website, track aggregated users' movements, and gather broad demographic information. Log files include IP addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks.

## 6. Retention

Solvaire retains Personal Information for varying periods of time depending on the following:

- The type of Personal Information;
- Whether the Personal Information is typically stored and erased in accordance with a specific schedule, such as information collected for marketing purposes;
- Whether the Personal Information must be retained to operate or provide the Services;
- Solvaire's legitimate interests or legal purposes, including record-keeping, safety, security, enforcing legal rights, fraud prevention, and network improvement; and
- Whether the Personal Information must be retained to comply with legal obligations, such as record-keeping requirements for regulatory audits.

## 7. Your Privacy Rights

As a data subject, you have certain privacy rights with regard to the handling of your Personal Information. Depending on your physical location or place of residence, you may have enhanced rights.

If you are a natural person residing in one of the countries in the European Economic Area, the United Kingdom, Switzerland, or any country or state in the United States that has enacted a jurisdiction-specific privacy law (each a "**Data Protection Jurisdiction**") and to the extent such laws are applicable to Solvaire, you have certain Privacy-Related Rights ("**Rights**") with respect to your personal information. The followings section is intended to provide a general outline of these Rights and Solvaire's recognition of and compliance efforts related to such Rights.

**Right to Notice:** At or before the point of collection of personal information, customers, employees, job applicants and other individuals are entitled to a notice that provides the categories of personal information collected about them, and the purposes for that collection.

**Right to Know/Right to Access:** A customer has the right to request information regarding our collection, disclosure, sale and/or use of their personal information over the previous twelve (12) months. A customer may request that Solvaire disclose:

- Categories of personal information that we have collected about you;
- Categories of sources from which your personal information is collected;
- Categories of personal information about you that we have sold or disclosed for a business purpose;
- Categories of third parties to whom the personal information was sold or disclosed for a business purpose;
- The business or commercial purpose for collecting or selling personal information; and
- Specific pieces of personal information that we have collected about you.

When providing you with your information electronically, Solvaire will, to the extent possible, deliver the information in a portable manner that allows you to transfer the information to another entity.

Solvaire may reject your request to know if your identity cannot be verified (your request is not a verifiable customer request), or if the information has already been provided twice within a twelve (12) month period. Solvaire may also refuse to provide you with specific pieces of information that we have collected about you if disclosure creates a substantial, articulable, and unreasonable risk to the security of that personal information, your account with Solvaire or the security of our systems.

**Right of Deletion:** A customer has the right to request the deletion of any personal information that we have collected from them, or that we maintain about them. Following our receipt of your verifiable customer request, Solvaire will delete (and direct our service providers to delete) your personal information, subject to the exceptions permitted under the applicable privacy law, and any legal obligations that we have to retain that information.

**Right to Opt-Out of the Sale of Your Personal Information:** Some laws may provide customers with the right to opt-out of the sale (as defined under the law) of their personal information. Solvaire does not sell personal information, and thus does not provide you with a mechanism for opting out.

**Right to Non-Discrimination:** Solvaire will not discriminate against you in response to your decision to exercise any of the privacy rights granted to you under any applicable privacy law.

**Asserting Your Rights - Submitting a Request to Know or Delete:** As previously stated, Solvaire may reject your request if we cannot verify your identity. Please follow the instructions below and provide the requested information to allow us to adequately address your request.

- If you are a current or former employee of Solvaire residing in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Solvaire may have, you may submit your request via email at [helpdesk@solvaire.com](mailto:helpdesk@solvaire.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - Your full name and email address associated with your profile;
  - Your preferred contact phone number; and
  - Your hire date. Where possible, we require your hire date to be provided in the MM/DD/YY format.
- If you previously applied for employment with Solvaire (job applicants) and reside in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Solvaire may have, you may submit your request via email at [helpdesk@solvaire.com](mailto:helpdesk@solvaire.com). In the email, please indicate which Right you are exercising. In order to verify your identity, your request must include the following:
  - Your full name and email address associated with your profile;
  - Your preferred contact phone number; and
  - The number of employment opportunities you have applied for with Solvaire, as well as the Job Title and Job Code associated with each application, to the extent available.
- If you have provided Solvaire with your information via our Website and reside in a Data Protection Jurisdiction and want to assert the Right to request to know or delete any personal information Solvaire may have, you may submit your request via email at [helpdesk@solvaire.com](mailto:helpdesk@solvaire.com).
  - Your full name and email address, as provided by you to Solvaire via our Website;

- Your preferred contact phone number; and
- A brief description of why you believe Solvaire has your personal information (i.e., you have submitted a “contact us” form through our Website). Please note that any information you provide to Solvaire under this section will be used solely for verification purposes and deleted once verification is established.

**Authorized Agents:** You may exercise your right to know or your request for deletion of your personal information, through the use of an authorized agent. A request from an authorized agent on your behalf will only be accepted if the authorized agent provides us with written proof they are authorized to act on your behalf. We may also first require the authorized agent to verify their identity before accepting the request. Solvaire may deny requests from authorized agents that fail to provide proof of their status as an authorized agent or verification of their identity.

## **8. Data Security**

Solvaire has industry reasonable security measures in place to help protect against the loss, misuse, and alteration of the data under its control. The security measures include system and network components, and application components. When the Website is accessed using a compatible internet browser, Secure Socket Layer (SSL) technology protects information using both server authentication and data encryption to help ensure that the data are safe, secure, and available only to you.

Solvaire makes a good faith effort to store Personal Information in a secure operating environment that is not open to the public but does not and cannot guarantee the security of your Personal Information. If Solvaire becomes aware that your Personal Information has been disclosed in a manner not in accordance with this Policy, reasonable efforts will be used to notify you of the nature and extent of the disclosure (to the extent that such information is known) as soon as reasonably possible and as permitted or required by law.

## **9. Children**

The Website is not intended for use by children under 13 years of age, and Solvaire does not knowingly collect Personal Information from children under 13. No one under age 13 may provide any information to or on the Website. If you are under 13, do not attempt to use or provide any information on this Website. If Solvaire learns that it has collected or received personal information from a child under 13 without verification of parental consent, this information will be deleted.

## **10. Changes to the Privacy Policy**

Solvaire reserves the right to amend this Policy at any time, for any reason, without additional notice, other than through posting the updated Policy on this Website. The date this Policy was last revised is identified at the top of the page. Users are responsible for periodically visiting the Website and this Policy to review any changes.

## **11. Contact Information**

To ask questions or provide comments about this Policy or Solvaire’s privacy practices, or to submit a complaint, contact us at: [helpdesk@solvaire.com](mailto:helpdesk@solvaire.com).