

Personal Privacy Policy



Global System

Version 5.0

July 9, 2018

Company Sensitive and Proprietary

Revision History

Date	Version	Page(s)	Description	Author
March 20, 2018	1.0	All	Initial Version	Keith Frederick
April 18, 2018	2.0	All	Updated version adding the review and comments from Privacy Shield	Keith Frederick
April 26, 2018	3.0	All	Updated version adding the review and comments from Privacy Shield	Keith Frederick
June 26, 2018	4.0	All	Updated version adding a statement about processing could take place in the United States.	Keith Frederick
July 9, 2018	5.0	All	Adding updates from comments made by the Privacy Shield team at the U.S. Department of Commerce's International Trade Administration (ITA).	Keith Frederick

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RigNet Personal Privacy Policy

RigNet commits to subject to the Principles all personal data received from the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks and to cooperate with EU Data Protection Authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship. We are committed to applying the Principles to EU-U.S. and Swiss-U.S. data subjects' personally identifiable information, including the Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose, Limitation, Access, and Recourse, Enforcement and Liability. To learn more about the Privacy Shield program and the Framework Principles, visit the U.S. Department of Commerce's Privacy Shield List, <https://www.privacyshield.gov/>. In the event of a conflict between the terms in this privacy policy and the Principles, the Principles shall govern.

RigNet has its headquarters in the United States. Information we collect from you will be processed in the United States. The United States has not sought nor received a finding of "adequacy" from the European Union under Article 45 of the GDPR. RigNet relies on derogations for specific situations as set forth in Article 49 of the GDPR. In particular, RigNet collects and transfers to the U.S. personal data only: with your consent; to perform a contract with you; or to fulfill a compelling legitimate interest of RigNet in a manner that does not outweigh your rights and freedoms. RigNet endeavors to apply suitable safeguards to protect the privacy and security of your personal data and to use it only consistent with your relationship with RigNet and the practices described in this Privacy Notice. RigNet also enters into data processing agreements and model clauses with its vendors whenever feasible and appropriate.

This document, RigNet Global System (RGS) Personal Privacy Policy, addresses questions around personal information privacy so, individuals are informed on:

1. RIGNET IS PARTICIPATING IN THE PRIVACY SHIELD

RigNet is a public safety technology and service provider. Our online and mobile services are aimed at providing value-added services to our users based on their opt-in and selection. **We do not engage in advertising, selling of personal information to third parties, or other such activities that use personal information for anything beyond provisioning of our declared service.** Protecting your personal information is top priority for us!

RigNet complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework 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 Switzerland to the United States. RigNet subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC), the Department of Transportation or any other U.S. authorized statutory body. RigNet annually self-certifies its commitment to apply the Principles to all personal data received or collected from the EU and Swiss. The Department of Commerce reviews the RigNet self-certification and includes RigNet in the list of Privacy Shield program participant companies if RigNet's Privacy Shield certification is found to be acceptable. 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/>

In compliance with the Privacy Shield Principles, RigNet commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact RigNet at:

RigNet
Attention: Chief Information Security Officer (CISO)
15115 Park Row Blvd., Suite 300
Houston, TX 77084

2. TYPES OF INFORMATION DATA COLLECTED

Personal Information we collect when you register with us online or create an online account: You can browse the Website without registering with us or creating an online account. If you choose not to register with us or create an online account, we do not collect your personal information. However, in order to access certain resources or services via the Website (e.g., to download reports or papers, access technical alerts or to join technical forums), you will need to register with us. If you register and create an online account, we collect certain personal information about you such as:

- Your first and last name;
- Your telephone number;
- Email address;
- Job function;
- Job title;
- Organization name and size; location; and
- Whether or not you are acting on behalf of a current customer.

Personal Information we collect when we obtain online feedback from you: We collect your name, online contact information and any other personal information that you choose to provide in the context of obtaining online feedback from you. At your option, we may also collect your organization's name and physical contact information although we may already hold this information if you have provided it to us for another purpose.

Personal Information that we collect when you apply online for employment: You may submit personal information through use of our website to be considered for employment at RigNet. Such information includes your name, your address, your phone number, your email address, job preferences, experience, desired salary, relocation preferences, work authorization, security clearance, education, job skills and other information contained on your resume or curriculum vitae (CV). RigNet uses such information solely for consideration of your candidacy for employment, to communicate with you and to generate related correspondence, including offer letters and employment agreements. Such information may also be used, subject to applicable local laws, to conduct necessary background checks for compliance and other employment related purposes. Finally, RigNet only retains such information for as long as is necessary to address your employment application and any questions that may arise regarding

your application's processing. Your submission of personal information or a resume through our website constitutes your consent to the collection, storage and use of that information, including in the United States, as described above.

Personal Information we obtain from other sources: We also may periodically obtain both personal and non-personal information about you from RigNet subsidiaries, business partners or resellers and other third-party sources and add it to the information we already hold about you, such as:

- Updated business address information;
- Purchase history;
- Demographic information; and
- Credit information about Customers, Vendors or Business Partners from credit reference agencies.

3. PURPOSES FOR WHICH RIGNET COLLECTS AND USES PERSONAL INFORMATION.

We collect information:

- To provide the RigNet Personal Safety Service to you and services based on your location
- To send you an account confirmation
- To confirm your affiliation and eligibility to connect your account with the organizations you select
- To personalize your experience
- To respond to customer service requests
- To administer your account
- To respond to your questions and concerns
- To identify you when you submit or share your content

4. YOUR CHOICES.

If at any time you decide you do not want us to retain any personal information we collected from you when you registered on our website, or otherwise collected about you from others, you may request we delete your information. Of course, once we delete your information you will no longer be registered with us and you will not have access to the services that are only available through registration. **Note:** Even if you are not registered with us we collect Navigation and click-stream data, HTTP protocol elements, and search term data, which helps us to optimize the browsing experience. This data is not personally identifiable if you are not registered on the website.

You may opt-out of receiving marketing messages from RigNet without de-registering with us. To opt out of receiving marketing messages please send an opt out email to ServiceDesk@rig.net. Please note that, by opting out, you acknowledge and agree that you will not receive emails concerning upgrades and enhancements to RigNet products. However, we will continue to send you services-related (non-marketing) communications in connection with the administration of your organization's account and products or services that you have requested from RigNet on behalf of your organization.

5. YOUR RIGHTS: ACCESSING AND CHANGING YOUR PERSONAL INFORMATION.

RigNet seeks to ensure that your information and preferences are accurate and complete. You have the right to update your information and/or preferences at any time. If you wish to review or change the information we have regarding you or to update your preferences regarding our retention or use of your personal information please let us know by sending an e-mail with your name, full mailing address and e-mail address to ServiceDesk@rig.net together with a description of the changes you request. You may also make changes by writing to RigNet at:

RigNet
Attention: Chief Information Security Officer (CISO)
15115 Park Row Blvd., Suite 300
Houston, TX 77084

In certain circumstances, persons in the EU and Swiss may have rights of rectification (where data is inaccurate), erasure, restriction, objection or portability. EU and Swiss persons may also have a right to receive from us a copy of their personal data we have in our possession. To exercise these rights or to obtain a copy of the personal information we hold about you, please write to the above address.

6. QUESTIONS, OBJECTIONS AND COMPLAINTS.

We are responsible for our collection, use and disclosure of EU and Swiss Personal Data in accordance with the Principles. **We also are responsible for onward transfers to third party agents** that are processing such data on our behalf, unless we prove that we are not responsible for the event giving rise to the damage. **In certain situations, we may be required to disclose EU and Swiss Personal Data in response to lawful requests by public authorities, including meeting national security or law enforcement requirements.**

Where we are relying on our legitimate interests to process your personal data, you have the right to object to such processing. To exercise your right to object, please contact us as specified above. We will consider your objection and we will comply with it unless we have a compelling legitimate ground as permitted by applicable law.

RigNet is committed to reply to any questions and resolve any complaints you have about our collection or use of your Personal Data. Anyone with inquiries or complaints regarding our collection or use of his or her Personal Data may contact RigNet as specified above.

If you are a resident of the EU or Switzerland and you have an issue with the collection and transfer of your personal data to the United States you may also submit your complaints to **RigNet's alternative dispute resolution representative**, EU and Swiss DPAs serves as an Independent Resolution Body for dispute resolution (i.e., have agreed to participate in the dispute resolution procedures of the panel established by the EU and Swiss DPAs to resolve disputes pursuant to the Privacy Shield Framework). If none of the foregoing resolved your concern you may seek binding arbitration through the Privacy Shield Panel. The Privacy Shield arbitration program requirements can be found at <https://www.privacyshield.gov/>. **All involved should know that there is a possibility, under certain conditions, for the individual to invoke binding arbitration.**

7. PROTECTING YOUR INFORMATION

RigNet acknowledges your trust and is committed to protecting the information you provide to us. To prevent unauthorized access, maintain accuracy, and ensure proper use of information, we have employed physical, technical, and administrative processes to safeguard and secure the information we collect.

Website users can help further protect their personal information by using a secure web browser and by changing any access passwords regularly. Please note that data transmission over the Internet is not 100% secure and any information disclosed online can potentially be collected and used other than by the intended recipient. Please be aware that, by posting information to the technical forum via the Website, you may be making this information available to the public. You should be careful not to reveal any sensitive or other personal details about yourself.

We implement a variety of industry standard security measures to maintain the safety of your personal information when you enter, submit, or access your personal information.

We use a secure server complying with the RigNet's implementation of Risk Management Framework (RMF), (i.e., NIST SP 800-37 Rev 1) security mandates. All supplied sensitive information is transmitted via Secure Socket Layer (SSL/TLS) technology and then securely stored in our database to be only accessed by those authorized with special access rights to our systems, and who are required to keep the information confidential.

8. DATA RETENTION

We will retain your information for as long as your account is active or as needed to provide you services. If you wish to cancel your account or request that we no longer use your information to provide you services, contact us. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

9. INFORMATION SHARING

We will share your personal information and/or location only with organizations or individuals you explicitly connect your account to for the purpose of providing the RigNet Personal Safety Service and to the extent required to provide such service. When connecting to organizations, we typically require certain identification information (such as email or username) to identify and associate you with that organization. Any additional information that is shared with such organization will be clearly identified and you will have a choice whether to share such information or not. Please note that once information is shared with an organization you connect with, that organization's privacy policies and practices will apply to their use and disclosure of your information, and we have no control over those policies or practices.

We do not sell, rent, trade, or otherwise share your personal information with third parties beyond what is stated in this privacy policy without first providing you notice and choice.

We reserve the right to disclose your personal information as required by law (e.g., to comply with a subpoena, warrant, court order, or legal process served on our website) and when we believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, and/or respond to a government request. We may also sell, transfer, or

share the information we have collected (including personal information) in connection with a merger, acquisition, reorganization, or sale of our business or assets associated with the service, or in the event of bankruptcy.

We may combine the data you provide with other users' data, and we may share it with third parties in aggregated form as long as no personally identifiable information is included.

10. CORRECTING AND UPDATING YOUR PERSONAL INFORMATION

To review and update your personal information to ensure it is accurate, use the account management tools we offer with the service or contact us at ServiceDesk@rig.net.

11. DO WE USE COOKIES AND OTHER TRACKING MECHANISMS?

Cookies are very small text files that are stored on your computer or mobile device when you visit certain web pages. We use cookies on our site and service to:

- Keep track of your login account
- Personalize your experience

As part of our service operation, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser or mobile device type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or page views.

We use this information, which does not usually identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole.

12. POLICIES REGARDING CHILDREN

Our service and application are not directed to children. We do not knowingly collect any information from anyone under 13 years of age. If we are notified that a child under 13 had provided personal information to us without a parent or guardian's consent, we will remove that information from our records. Such requests should be directed to ServiceDesk@rig.net.

13. TERMS OF USE

Please also refer to our Terms of Use that set forth the restrictions, disclaimers, limitations of liability, and other terms and conditions governing the use of the RigNet Personal Safety Service.

14. YOUR CONSENT

By using RigNet system(s), application(s) and service(s), you consent to our privacy policy.

15. CHANGES TO OUR PRIVACY POLICY

We may update this policy from time to time as our information practices are modified or changed. If we make any material changes to this policy that affect your personal information,

we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this site prior to the change.

We encourage you to periodically review this Personal Privacy Policy for the latest information on our privacy practices.