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# LINK PRIVACY STATEMENT

Last updated September 6, 2021

This statement describes the personal data we collect and/or process (which may include collecting, organizing, structuring, storing, using, or disclosing) to provide Link products and Link services offered directly by VedaX. ("Link"), including Link's websites and its meetings, webinars, and messaging and digital workspace platform ("Link Products" or "Products").

### WHAT PERSONAL DATA DO WE RECEIVE?

Personal data is any information from or about an identified or identifiable person, including information that Link can associate with an individual person. We may collect, or process on behalf of our customers, the following categories of personal data when you use or interact with Link Products:

- **Account Information**: Information associated with an account that licenses Link Products, which may include administrator name, contact information, account ID, billing information, and account plan information.
- Profile and Participant Information: Information associated with the Link profile of a user who
  uses Link Products under a licensed account or that is provided by an unlicensed participant joining
  a meeting, which may include name, display name, picture, email address, phone number, job
  information, stated locale, location, user ID, or other information provided by the user or their account
  owner
- Contacts and Calendar Integrations: Contact information added by accounts or their users to
  create contact lists on Link, which may include contact information a user integrates from a thirdparty app. Users can also integrate their calendars from other services with their Link profile or
  account.
- **Settings**: Information associated with the preferences and settings on the account or user profile, which may include audio and video settings, recording file location, screen sharing settings, and other settings and configuration information.
- **Registration Information**: Information people provide when registering for a Link meeting, webinar or recording, which may include name and contact information, responses to registration questions, and other registration information requested by the host.
- **Device Information**: Information about the computers, phones, and other devices people use when interacting with Link Products, which may include information about the speakers, microphone, camera, OS version, hard disk ID, PC name, MAC address, IP address (which may be used to infer general location at a city or country level), device attributes (like operating system version and battery level), WiFi information, and other device information (like Bluetooth signals).
- Digital workspace, Meeting, Webinar, and Messaging Content and Context: Content generated in meetings, webinars, or messages that are hosted on Link Products, which may include audio, video, in-meeting messages, chat messaging content, transcriptions, written feedback, responses to polls and Q&A, and files, as well as related context, such as invitation details, meeting or chat name, or meeting agenda. Content may contain your voice and image, depending on the account owner's settings, what you choose to share, your settings, and what you do on Link Products.
- Product and Website Usage: Information about how people and their devices interact with Link Products, such as: when participants join and leave a meeting; whether participants sent messages and who they message with; performance data; mouse movements, clicks, keystrokes or actions (such as mute/unmute or video on/off), and other user inputs that help Link to understand feature usage, improve product design, and suggest features; which third-party apps users add to a meeting or other Product and what information and actions the app is authorized to access and perform; features used (such as screen sharing, emojis, or filters); and other usage information and metrics. This also includes information about when and how people visit and interact with Link's websites, including what pages they accessed, their interaction with the website features, and whether or not they signed up for a Link Product.
- **Communications with Link:** Information about your communications with Link, including relating to support questions, your account, and other inquiries.
- Information from Partners: Link obtains information about account owners and their users from third-party companies, such as market data enrichment services, including information about an account owner's company size or industry, contact information, or activity of certain enterprise domains.





# HOW DO WE USE PERSONAL DATA?

VedaX employees do not access meeting, webinar, or messaging content (specifically, audio, video, files, and messages) unless directed by an account owner, or as required for legal, safety, or security reasons, as discussed below. Link uses personal data to conduct the following activities:

- Provide Link Products and Services: To provide Products, features, and services to account owners, their users, and those they invite to join digital workspace and meetings and webinars hosted on their accounts, including to customize Product features and recommendations for accounts or their users. Link also uses personal data, including contact information, to route invitations and messages to recipients when people send invitations and messages using Link Products. This may also include using personal data for customer support, which may include accessing audio, video, files, and messages, at the direction of the account owner or their users. We also use personal data to manage our relationship and contracts with account owners, including billing, compliance with contractual obligations, and related administration.
- Product Research and Development: To develop, test, and improve Link Products, including, for example, content-related features (such as background filters), and to troubleshoot products and features.
- Marketing and Promotions: To market, advertise, and promote Link Products, features, and services, including marketing products or features based on your product usage or information we receive from third-party partners. If you visit our websites, we may log information about how and when you visit, and your interactions with them, and use this information to provide advertisements to you relating to Link Products, features, and services or to engage third-party marketing partners to log your interactions on our website or deliver advertising to you.
- Authentication, Integrity, Security, and Safety: To authenticate accounts and activity, detect, investigate, and prevent malicious conduct or unsafe experiences, address security threats, protect public safety, and secure Link Products.
- **Communicate with You:** We use personal data (including contact information) to communicate with you about our Products, features, and services, including product updates, your account, and changes to our policies and terms. We also use your information to respond to you when you contact us.
- Legal Reasons: To comply with applicable law or respond to valid legal process, including from law
  enforcement or government agencies, to investigate or participate in civil discovery, litigation, or
  other adversarial legal proceedings, and to enforce or investigate potential violations of our Terms
  of Service or policies.

Link uses advanced tools to automatically scan content such as virtual backgrounds, profile images, and files uploaded or exchanged through chat, for the purpose of detecting and preventing violations of our terms or policies and illegal or other harmful activity, and its employees may investigate such content where required for legal, safety, or security reasons.

## HOW DO WE SHARE PERSONAL DATA?

Link provides personal data to third parties only with consent or in one of the following circumstances (subject to your prior consent where required under applicable law):

- Resellers: If an account owner licensed Link from a third-party reseller of Link Products, the reseller
  may be able to access personal data and content for users, including meetings, webinars, and
  messages hosted by the account owner.
- Vendors: Link works with third-party service providers to provide, support, and improve Link
  Products and technical infrastructure. Link may also work with third-party service providers to
  provide advertisements and business analytics regarding Link Products. These vendors can access
  personal data subject to contractual and technical requirements for protecting personal data and
  prohibiting them from using personal data for any purpose other than to provide services to Link or
  as required by law.
- For Legal Reasons: Link may share personal data as needed to: (1) comply with applicable law or respond to, investigate, or participate in valid legal process and proceedings, including from law enforcement or government agencies; (2) enforce or investigate potential violations of its Terms of Service or policies; (3) detect, prevent, or investigate potential fraud, abuse, or safety and security concerns, including threats to the public; 4) meet our corporate and social responsibility



- commitments; (5) protect our and our customers' rights and property; and (6) resolve disputes and enforce agreements.
- Marketing and Analytics Partners: Link uses third-party marketing and advertising providers to provide statistics and analysis about how people are using our website and to provide advertising and marketing, including targeted advertising based on your use of our website. These third-party partners may receive information about your activities on Link's website through third-party cookies placed on Link's website. To opt out of our use of third-party cookies that share data with these partners, visit our cookie management tool. Where required by law, Link will first obtain your consent before engaging in the activities described here.
- Corporate Affiliates: Link shares personal information with corporate affiliates, such as VedaX Inc.,
  to provide integrated and consistent experiences across Link Products (such as enabling a user to
  integrate a Link Phone call into a meeting) and to detect, investigate, and prevent fraud, abuse, and
  threats to public safety.
- Change of Control: We may share personal data with actual or prospective acquirers, their representatives and other relevant participants in, or during negotiations of, any sale, merger, acquisition, restructuring, or change in control involving all or a portion of Link's business or assets, including in connection with bankruptcy or similar proceedings.

### WHO CAN SEE AND SHARE MY PERSONAL DATA WHEN I USE LINK?

When you send messages or join meetings and webinars on Link, other people and organizations, including third parties outside the meeting, webinar, or message, may be able to see content and information that you share:

Account Owner: An account owner is the organization or individual that signs up for a Link account. Typically, an account owner designates one or more people (called an "administrator") to manage their account and can grant privileges to users on the account. Depending on their license with Link, the account owner can authorize additional users on their account, and the account owner can create and/or access the profile information for all users on their account. The account owner and their users can invite others (including guests not on their account) to meetings or webinars hosted

Link gives account owners controls and features that they can use to determine whether certain types of content, such as recordings or out-of-meeting messages, can be created or sent, and what third-party apps can be used, for meetings and webinars hosted on their account. Depending on their settings, account owners and the people they designate can access personal data for people who join meetings and webinars on their account or send messages to users on their account. Specifically, account owners may have access to:

- Account Usage:
  - Product Usage: Information about how people and their devices interact with their account, which may include who sent messages to their users in chat, email addresses, IP addresses, device information, and other information about who joined meetings or webinars on their account, whether users viewed or downloaded a recording, how long people participated in their meetings, the time a message was sent, information about Link Phone integrations, and other usage information and feedback metrics.
  - Participant List: Information about the participants in a Link meeting, webinar, or chat, which may include name, display name, email address, phone number, and participant or user ID.
- Registration Information: Information provided during registration for a webinar, meeting, or recording hosted by the account.
- Link Chat Out-of-Meeting Messages: If enabled on their account, account owners can see information about who sent and received out-of-meeting messages to users on their account along with information about the message (for example, date and time, and number of participants). Depending on their settings, account owners also can see sender and receiver information, and other messaging data, along with the content of messages sent to and from users on their account.
- In-Meeting/Webinar Messages: Depending on their settings, account owners can see sender and receiver information, along with the content of messages sent to and from users on their account, in the following circumstances:





- Messages sent to Everyone in a meeting that is recorded
- Messages sent to panelists in a webinar that is recorded
- Direct messages if the account owner has enabled archiving
- Recordings: Account owners can watch the content of recordings of meetings and webinars hosted on their account. They can also view a transcript of meeting audio, if enabled.
- Polling, Q&A, and Feedback: Account owners can see information about who provided responses to their polls, Q&A, or post meeting or webinar feedback requests, including name and contact information, together with the responses or feedback, unless responses are submitted anonymously.
- Meeting Hosts and Participants: Hosts and other participants in a meeting may be able to see your email, display name, and profile picture. Meeting hosts and participants can also see and (depending on the account owner's settings) record or save meeting content, audio transcripts, messages sent to Everyone or to them directly, and files, whiteboards, or other information shared during a meeting. Hosts may also be able to see responses to Q&A and polls generated during the meeting.
- Webinar Panelists and Attendees: Only panelists may be visible to attendees during a webinar, but attendees who agree to unmute can be heard by other attendees. If an attendee agrees to become a panelist during a webinar, they may be visible to other attendees, depending on settings. Panelists and attendees may be able to see the name of a participant who asks a question during a Q&A, along with their question, unless the participant submits the question anonymously.
- Livestreams: Meeting and webinar hosts can choose to livestream to a third-party site or service, which means anyone with access to the livestream will be able to see the meeting or webinar.
- Third-Party Apps and Integrations:
  - Account owners can choose to add third-party apps to their account and the Link Products they use, and they can also give their users permission to add and use specific third-party apps, including in meetings, webinars, and chats hosted on their account. Depending on their settings, account owners and their users and guests can share your personal data and content with third-party apps and integrations they approve, which may include all of the personal data available to account owners, hosts, and participants listed above, such as account information, profile and contact information, registration information, participants list, settings, content, product usage, and device information.
  - Other participants in the meeting may be able to see the third-party app that you are using in a meeting, if the third-party app is receiving real-time features and information from the meetina.
  - Third-party developers may also integrate or embed Link meetings into their website or app experiences or build versions of Link that enable access to Link Products from a third-party
  - Personal information shared by account owners and users with third-party apps and integrations is collected and processed in accordance with the app developers' terms and privacy policies, not Link's.

## PRIVACY RIGHTS AND CHOICES

At your request, and as required by applicable law, we will:

- Inform you of what personal data we have about you that is under our control;
- Amend or correct such personal data or any previous privacy preferences you selected, or direct you to applicable tools; and/or
- Delete such personal data or direct you to applicable tools.

In order to exercise any of your rights as to personal data controlled by Link, or if you have any other questions about our use of your personal data, please send a request to info@vedax.ai. Please identify yourself and, for information relating to Link Products, specify your account and/or user information and other information to enable us to authenticate and respond to your request. Where legally permitted, we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, or jeopardize the privacy of others. As an account owner or a user under a licensed account, you may also take steps to affect your personal data by visiting your account and modifying your personal data directly.



# RETENTION

We retain personal data for as long as required to engage in the uses described in this Privacy Statement, unless a longer retention period is required by applicable law.

The criteria used to determine our retention periods include the following:

- The length of time we have an ongoing relationship with you and provide Link Products to you (for example, for as long as you have an account with us or keep using our Products);
- Whether account owners modify or their users delete information through their accounts;
- Whether we have a legal obligation to keep the data (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to the enforcement of our agreements, the resolution of disputes, and applicable statutes of limitations, litigation, or regulatory investigation).

#### **CONTACT US**

In order to resolve a complaint regarding the Site or to receive further information regarding use of the site, Please contact us at:

VedaX Inc.

at No. 49, Street No. 19, Quarter 5, An Phu Ward, Thu Duc City, Ho Chi Minh City, VietNam info@vedax.ai



