

1. Latest Policy Update & Amendments

This Privacy Policy was last updated on October 5th, 2022. DragonWave Ltd. reserves the right to amend this Privacy Policy at any time. Subsequent releases of this Privacy Policy will supersede and thereby invalidate this version of the policy. Please ensure that you reference the latest version of this policy by downloading it directly from the DragonWave Ltd. website: <https://dragonwaveld.com/>

2. DragonWave Ltd. Company Details & Definition

DragonWave Ltd. has its registered office headquarters at:

Poortland 66
1046 BD Amsterdam
The Netherlands

It is registered at the Chamber of Commerce (Kamer van Koophandel) in The Netherlands under registration number: 78114608.

DragonWave Ltd. currently trades as:

1. DragonWave Ltd. and
2. Bright Connection B.V.

DragonWave Ltd. and its subsidiaries, branches, parent and sister companies and trade names will hereinafter collectively and individually be referred to as: “**DragonWave Ltd.**”.

3. Policy Scope

This Privacy Policy pertains to all data and information that DragonWave Ltd. collect from and process for – or on behalf of – visitors to DragonWave Ltd. website(s). This Privacy Policy describes the type of personal data processed by DragonWave Ltd., and the purpose for which they are processed.

3. Our Commitment & Legal Framework

The personal data of our website visitors are processed and protected with utmost care. DragonWave Ltd. commits to protecting the privacy of its customers and the visitors of its websites. To this end, it complies with the requirements of the Dutch Personal Data Protection Act (*Wet bescherming persoonsgegevens*) and the Telecommunications Act (*Telecommunicatiewet*).

The visitor’s data won’t be used for any other than the stated purposes and won’t be shared with or disclosed to any third party by DragonWave Ltd., unless:

1. there is a strict legal obligation to do so, like for example a Court Order,
2. DragonWave Ltd. is acquired by a 3rd party entity – refer to Section 8.

4. Data Captured During Website Visit

This section applies to all visitors to DragonWave Ltd. websites.

DragonWave Ltd. may use cookies on its websites. A cookie is a (small) file downloaded onto the browsing device or devices of the website visitor when (s)he accesses our website(s). The cookie is stored locally on

the browsing device(s). The data contained in the cookie can be retrieved and retransmitted towards our web servers during future website visits by that same visitor's browsing device(s).

DragonWave Ltd. may use the following types of cookies:

1. *Functional cookies*: facilitate navigation, logging on to websites and storing user settings & preferences. Example: a user logs in to a website. A cookie tells DragonWave Ltd.'s web server, during the next visit, that this specific user is already logged on and that there is no need for a renewed log-in procedure.
2. *Google Analytics*: the US-based company Google puts cookies on websites as part of its Analytics service. DragonWave Ltd. may use this service to receive reports on how website visitors use our websites. Google may share this information with third parties if it is required to do so by law, or if third parties process the data on behalf of Google. Note that this process is beyond DragonWave Ltd.'s control. DragonWave Ltd. has **not** authorized Google to use the analytics information obtained for other Google services.

DragonWave Ltd. will furthermore capture the following data pertaining to the visitors of its websites:

1. Data relating to the device and browser that were used to visit our websites:
 - (1) Device's IP address (this is stored on an anonymized basis),
 - (2) Device's screen format,
 - (3) Type of device used,
 - (4) Browser used.
2. Data relating to the website visit:
 - (5) Date and time of the website visit,
 - (6) Website through which our website was found,
 - (7) Pages on our website that were visited,
 - (8) Country where the visitor was located at the time of the website visit,
 - (9) The preferred language set in the browser used for the website visit.

5. Data Captured when Downloading Marketing Materials

This section solely applies to DragonWave Ltd. website visitors that decide to download marketing materials – like for example product brochures and white papers – from DragonWave Ltd. websites.

To qualify for the download(s), the visitor will consent to providing the personal data listed below. (S)he will also consent to that data being stored and used by DragonWave Ltd. for marketing and business (development) purposes only.

The term “marketing purposes” may comprise any reasonable DragonWave Ltd. marketing activity like sending electronic newsletters to the visitors' email address on an occasional or regular basis, sharing of updated product collaterals, extending invitations by email and/or phone to collaborate on market research etc.

The term “business” development” above may comprise DragonWave Ltd. (sales) representatives contacting the visitor on his or her email address and/or (cell) phone with the purpose of selling DragonWave Ltd. products, services and solutions.

In the context of sharing its marketing materials with its website visitors, DragonWave Ltd. *may* request and process any or all of the following additional personal data:

1. Full name (First Name, Family Name),
2. Email address,
3. Telephone number,
4. Company name,
5. Position of the visitor in aforementioned company.

6. Viewing or Amending Personal Data

A DragonWave Ltd. website visitor can decide to request DragonWave Ltd. to view the personal data DragonWave Ltd. keeps on him or her. Furthermore, this data will be amended on his or her request and instructions.

Requests to view or amend personal data shall be directed at: info@dragonwaveltd.com, stating the visitor's full name – required for identification purposes – and stating the purpose of the request (viewing or amending personal data). In case the purpose is amending personal data; the correct personal data must be supplied by the website visitor. The viewing or amendment request will be processed within thirty (30) working days.

7. Opting Out

A DragonWave Ltd. website visitor can decide to order DragonWave Ltd. to permanently delete his or her personal data from DragonWave Ltd.'s website-related database(s). Sending an email to: info@dragonwaveltd.com, stating the visitor's full name – required for identification purposes – will suffice.

The opt-out request will be processed within thirty (30) working days. As a result, the opt-out visitor may continue to receive communication from DragonWave Ltd. for a short while after opting out.

8. Business Transfer

In case DragonWave Ltd. is acquired by a third party, the personal data of some of its website visitors – those visitors that have provided personal data – will be transferred to such third party. DragonWave Ltd. will promptly inform the affected website visitors about such a data transfer, giving them the opportunity to opt out of such a transfer of their personal data following the procedure outlined in Section 7.

9. Contact

If you have any questions about how DragonWave Ltd. handles your data, please send an email to info@dragonwaveltd.com