DATA PRIVACY FRAMEWORK POLICY

Last Updated April 23, 2025

Any provision not specifically laid out in this portion of the Privacy Policy specific to the Data Privacy Framework Policy ("DPF Policy") shall have the same meaning as set forth in our general Privacy Policy found **here**. N1D incorporates by reference the provision of its general Privacy Policy as if set forth fully herein. In the event of a discrepancy between this DPF Policy and our general Privacy Policy, this DPF Policy shall govern if the data subject is located in the European Union (EU), European Economic Area (EEA), United Kingdom (UK), or Switzerland.

The General Data Protection Regulation and other European privacy laws provide individuals located within the European Union, EEA, and United Kingdom (i.e., data subjects) with specific rights regarding Personal Data. This DPF Policy has been compiled to assist you ("you," "your," or "User") to understand how N1 Discovery LLC ("we", "our," "us," or "N1D"), and our affiliates and subsidiaries, collect, use, and disclose your Personal Data.

This DPF Policy applies to Users in the EU, UK and Switzerland only:

Under EU Regulation 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, including the United Kingdom's substantially similar law as it takes effect in the United Kingdom by virtue of the Data Protection Act 2018 (collectively the "GDPR") and the Swiss Federal Act on Data Protection ("FADP"), you have a number of rights when it comes to your personal information. Further information and advice about your rights can be obtained from the data protection regulator in your country of residence. You can exercise any of these rights by contacting us through our email, phone or mailing address in the **Contact Us** section below.

This DPF Policy describes our practices in connection with information that we collect under the GDPR and the EU-US Privacy Framework ("Privacy Framework") through your use of the N1D website (the "Site") and the N1D official social media pages that we control (our "Social Media Pages"), as well as through email messages that we send to you (collectively, the Social Media Pages and Site, the "Sites"). Additionally, this DPF Policy describes your privacy rights and how to exercise those rights.

For our general Privacy Policy, **please click here**. N1D is subject to the authority of the Federal Trade Commission as a self-certifying entity under the EU-US Privacy Framework.

To the extent permitted by applicable law, your use of this Site constitutes your consent to the transfer of your Personal Data to N1D in the United States in the context of the EU-US Data Privacy Framework as set out in Commission Implementing Decision of July 10, 2023 pursuant to the GDPR on the adequate level of protection of personal data under the EU-US Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

Notice of Data Collection

We collect the following categories of personal information when you interact with us: identifiers/contact information, business information, geolocation data, and inferences drawn from the data collection. This information is collected to provide our services to your business.

We may also collect personal information about you if you are interested in becoming employed by N1D. A more detailed description of the categories of data and the legal purpose for collection of that data is located in our Privacy Policy under “What Do We Do With the Personal Information We Collect?” If you are a prospective employee, N1D will provide you with a separate Employee Privacy Notice that explains how we collect, use, store, and share your data.

Data Privacy Framework

N1D complies with the Privacy Framework as set forth by the U.S. Department of Commerce. N1D has certified under the Privacy Framework that it adheres to the EU-U.S. Data Privacy Framework Principles (“Privacy Framework Principles”) with regard to the processing of personal data received from the European Union for any sales and/or employment. If there is a conflict between the terms in this DPF Policy and the Privacy Framework Principles, the Privacy Framework Principles shall govern. To learn more about the Data Privacy Framework (“DPF”) Program, and to view our certification, please visit the website: dataprivacyframework.gov.

European Data Protection Authority

In compliance with the Privacy Framework, N1D commits to cooperate and comply with the advice of the panel established by the EU Data Protection Authority (“DPA”) and the UK Information Commissioner’s Office (“ICO”) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the Privacy Framework within the context of the employment relationship. You can find out more and/or contact the EU DPA at https://www.edpb.europa.eu. You find out more and/or contact the UK ICO at https://ico.org.uk/

Privacy Rights

EU Data Rights

If you are an employee or user in the EU, you have the following rights with respect to our handling of your Personal Data.

1. Right of access

Data subjects can request details of their personal data, including its source, automated decision-making, and whether it has been transferred to a third country. The controller must provide a copy of the data in a commonly used electronic form and may charge a reasonable fee for additional copies.

2. Right of correction

Data subjects can request that incorrect or incomplete personal information be edited or updated.

3. Right to be forgotten

Data subjects can request that their personal information be deleted in certain circumstances.

4. Right to restrict processing

Data subjects can request that the processing of their personal information be limited in certain circumstances.

5. Right to data portability

Data subjects can obtain and reuse their personal data for their own purposes across different services. This includes receiving their data in a structured, commonly used, and machine-readable format, and likewise requesting that a controller transmit it directly to another controller.

6. Right to withdraw consent

Data subjects have the right to withdraw their consent to the processing of their personal data at any time. The withdrawal should be as easy as consenting, and the lawfulness of processing carried out before its withdrawal is unaffected.

Users in the EU also have the right to file a complaint relating to our handling of your Personal Data with the National Supervisory Authorities. The organization's contact information can be found at https://edpb.europa.eu/about-edpb/board/members_en.

You may also submit questions, comments, or complaints to us at the address below.

7. Right to lodge a complaint

You have the right to lodge a complaint about the way we handle or process your Personal Data with your national data protection regulator:

- UK Information Commissioner's Office (ICO) at www.ico.org.uk
- EU authorities at http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm
- Swiss FDPIC at https://www.edoeb.admin.ch/edoeb/en/home/the-fdpic/contact.html

EU, UK and Swiss Data Subjects and Extra-territorial

N1D safeguards personal data received in the United States from the UK, EU and Switzerland about former, current, or prospective corporate customer contacts and which is regulated by the GDPR or FADP. N1D is committed to protecting such GDPR Personal Data in accordance with our obligations under applicable law, such as GDPR Articles 45 to 50, and the Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement and Liability.

N1D has implemented appropriate cross-border transfer solutions in accordance with the GDPR, such as European Commission Standard Contractual Clauses and the UK's International Data Transfer Addendum ("UK Addendum") and FADP as the legal basis for transferring personal data to third countries, including the United States. To the extent permitted by applicable law, your use of this Site constitutes your consent to the transfer of your Personal Data to N1D in the United States in the context of the EU-US Data Privacy Framework as set out in Commission Implementing Decision of July 10, 2023 pursuant to the GDPR on the adequate level of protection of personal data under the EU-US Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF).

N1D complies with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. DPF as set forth by the U.S. Department of Commerce. N1D has self-certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. N1D has self-certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) Program and view our certification, please visit www.dataprivacyframework.gov

N1D as Data Controller: In all cases where N1D transfers personal information to a third party acting as a controller, N1D will comply with the Notice and Choice Principles. N1D will enter into a contract with the third-party controller that provides that such data may only be processed for limited and specified purposes consistent with the consent provided by you and that the recipient will provide the same level of protection as the Principles and will notify N1D if it makes a determination that it can no longer meet this obligation. The contract also provides that when such a determination is made, the third-party controller will cease processing or take other reasonable and appropriate steps to remediate.

N1D as Data Processor: In all cases where N1D transfers personal data to a third party acting as an agent (processor for GDPR purposes), N1D will: (i) transfer such data only for limited and specified purposes; (ii) ascertain that the agent is obligated to provide at least the same level of privacy protection as is required by the Principles; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the personal information transferred in a manner consistent with the organization's obligations under the Principles; (iv) require the agent to notify N1D if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the Principles; (v) upon notice, including under (iv), take reasonable and appropriate steps to stop and remediate unauthorized processing; and (vi) provide a summary or a representative copy of the relevant privacy provisions of N1D's contract with that agent to the U.S. Department of Commerce upon request. If we transfer personal data to a third-party agent, we shall remain liable to you if the agent processes personal data in a manner inconsistent with the DPF Principles, unless we can prove that we are not responsible for an event giving rise to the damage.

Exercising Your Data Rights

To exercise the data rights described above, please submit a request to us by contacting us at:

ATTN: PRIVACY OFFICER
N1 DISCOVERY, LLC.
1450 W. LONG LAKE ROAD
SUITE 230
TROY, MICHIGAN 48098-6355
USA

Only you or a person authorized to act on your behalf may initiate a request related to your Personal Data. You may also make a request on behalf of your minor child.

Please be advised that we cannot respond to your request or provide you with your Personal Data if we cannot verify your identity or authority to make the request and correspondingly confirm the Personal Data relates to you. Making a data rights request does not require you to create an account with us. We will only use Personal Data provided in a data request to verify the requestor's identity or authority to make such a request.

If you would like to submit a complaint with respect to the implementation of this DPF Policy and our processing of your Personal Data, please contact:

ATTN: PRIVACY OFFICER
N1 DISCOVERY, LLC.
1450 W. LONG LAKE ROAD
SUITE 230
TROY, MICHIGAN 48098-6355
USA

As stated above, we may request official verification of your identity when you submit a complaint. In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, N1D commits to cooperate and comply respectively with the advice of the panel established by the EU Data Protection Authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship. You may, subject to its terms, invoke binding arbitration in accordance with Annex I of the DPF Principles: https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction

This provides that you may invoke binding arbitration by delivering notice to N1D and following the procedures subject to conditions set forth in Annex I of the DPF Principles.

Please note that we are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). We hold and are subject to the rules of the professional investigator license pursuant to the State of Michigan Professional Investigator Licensure Act, MCL 338.821 et seq.

Access, Choice, Recourse, Enforcement, and Liability

As explained above, you have the right to access the Personal Data N1D holds about you. If the Personal Data is inaccurate or processed in violation of the Data Privacy Framework Principles, you may request that your Personal Data be corrected, amended, or deleted.

You have the right to opt-out of:

- Disclosures of your Personal Data to third parties not identified at the time of collection or subsequently authorized; and/or
- Uses of Personal Data for purposes materially different from those disclosed at the time of collection or subsequently authorized.

N1D, or one of its recruitment agents, is responsible for informing you of these rights.

N1D's participation in any frameworks are subject to investigation and enforcement by the Federal Trade Commission ("FTC") under its certification to the Privacy Framework. N1D agrees to periodically review and verify any compliance and to remedy any issues arising out of failure to comply.

Right to Arbitration

Under certain conditions, you may be able to invoke your right to binding arbitration related to an alleged or yet to be proven violation by N1D of its obligations under the Privacy Framework. Under the Privacy Framework, N1D is obligated to arbitrate claims and follow the terms as set forth in Annex I of the Privacy Framework Principles, provided that an individual has invoked binding arbitration by delivering notice to N1D and following the procedures and subject to conditions set forth in Annex I of Privacy Framework Principles. You can find Annex I of the Privacy Framework Principles **here**.

Accountability for Onward Transfer

In the event N1D transfers personal data covered by this Privacy Policy to a third party acting as a controller, we will do so consistent with any notice provided to you and any consent you have given, and only if the third party has given N1D contractual assurances that it will fulfill the following:

- Process the personal data for limited and specified purposes consistent with any consent provided by you;
- Provide at least the same level of protection and notify N1D if it makes a determination that it cannot do so; and
- Remediate if it makes such a determination.

If N1D becomes aware that a third party acting as a controller is processing personal data covered by this DPF Policy in a way that is contrary to the Privacy Framework Principles, N1D will take reasonable steps to prevent such processing.

Disclosures and Transfers

We do not disclose an individual's personal data to third parties, except when one or more of the following conditions is true:

- The third party is part of N1D.
- We have your permission to make the disclosure.
- The disclosure is required by lawful request by public authorities, including to carry out national security or law enforcement requirements.
- The disclosure is required by law or mandatory professional standards.
- The disclosure is reasonably related to the sale or other disposition of all or part of our business.
- The information in question is publicly available.
- The disclosure is reasonably necessary for the establishment of legal claims.
- The disclosure is reasonably necessary and/or required to fulfill our business relationship with you. The business relationship can either be as a prospective employee, current employee, terminated employee, or customer.

Business Transfers

N1D or any part of its business, including our Sites, may be sold at some point in the future. Should this occur, your Personal Data may be transferred to a subsequent owner, co-owner or operator of the business unit or Site. We also may disclose and transfer your Personal Data in connection with a corporate merger, consolidation, restructuring, the sale of stock or assets, or other corporate change, including, without limitation, during the course of any due diligence process.

In such a case, we will enter into an agreement with the third-party transferee, which agreement will include the confirmation by such third party that it will provide the same level of protection as what has been contemplated herein and in the EU-US Data Privacy Framework. If such third-party transferee would no longer be able to provide the same level of protection as what has been set out in the EU-US Data Privacy Framework, such party will notify us and the Data Subjects if it makes the determination that it can no longer meet this requirement.

How to Contact N1D

To make a request pursuant to any of the above-referenced rights, including access or deletion, please email **privacy@n1discovery.com**. In order to complete a request, N1D may need to verify your identity. We may send you a link to verify your email address and request additional documentation or information solely for the purpose of verifying your identity.

You may also write to us at:

ATTN: PRIVACY OFFICER
N1 DISCOVERY, LLC.
1450 W. LONG LAKE ROAD
SUITE 230
TROY, MICHIGAN 48098-6355
USA

Please be advised that we will respond to a request within thirty (30) days of receipt or notify you that we require more time to respond and the corresponding reason for the extended response time. In addition, we will deliver our written response by mail or electronically, depending on the method you originally contacted N1D.

Change History

Date of Change	Description of Change
April 23, 2025	Release of N1D's DPF