

<u>Please click here, if you are an European Economic Area or United Kingdom resident, for applicable GDPR Privacy</u> Notice.

<u>Please click here, if you are a California resident, for Exela Technologies, Inc.'s California Supplemental Privacy</u> Statement.

Privacy Policy

1. Scope

[PRODUCT NAME] was created by and is owned by subsidiaries of Exela Technologies, Inc. (together with its subsidiaries, the "Company," "We," "Us" or "Our"). If you are using [product name] or the services (the "Services") or a related website, then this Privacy Policy applies.

This Privacy Policy defines Company objectives for securing and protecting personally identifiable information and other information. This Privacy Policy provides a description of our policies and procedures for collecting, using, and disclosing your personal data and other information. It also tells you about your privacy rights and how the law protects you.

Users can access the Services through our websites and other affiliated sites (the "Sites"), applications on devices. A "Device" is any computer used to access the Service, including without limitation a desktop, laptop, mobile phone, tablet, or other Internet-enabled electronic device. This Privacy Policy governs your access of the Service, regardless of how you access it, and by using our Service you consent to the collection, transfer, processing, storage, disclosure and other uses described in this Privacy Policy.

This Privacy Policy refers to different categories of users, specifically: "Visitor" refers to a user who accesses the Sites but does not register; "Registered User" refers to a user who signs up for an account with the Service; and "Subscriber" refers to a Registered User who purchases a subscription plan for the Service. All of the different forms of data, content, and information described below, including without limitation Personal Data, are collectively referred to as "information."



2. Policy

2.1. OBJECTIVES

- 2.1.1. The Company adheres to Federal, State, and Local regulatory and customer privacy requirements. Below is applicable to the United States of America territory and its residents.
- 2.1.2. The Company collects personally identifiable information when voluntarily submitted by our online and onsite visitors. The information provided is used to fulfil specific requests unless given permission to use it in another manner.
- 2.1.3. In connection with the services we provide, the Company may collect the following types of information:
 - <u>Personally Identifiable Information</u>. Names, addresses, email addresses, phone numbers, birthdates, social security, taxidentification, financial account, national insurance numbers, and company information.
 - Cookies. When a <u>visitor views Company websites</u>, a cookie is sent out to the viewer's computer that will identify the visitor's browser. These cookies enable the website to recognize the visitor's computer the next time the visitor views the Company website. These cookies will be used exclusively to collect information concerning the use of the website. Cookies contain no personally identifiable data, so the visitor's personally identifiable information is not collected or retained.
 - <u>User Communications</u>. When a visitor sends an email or other communication to the Company, these communications may be retained in order to process inquiries, respond to requests, and improve overall services.
 - Affiliated Websites. Personal information that a visitor may provide to websites affiliated with the Company may be sent to the Company in order to deliver services to the Company or other entities affiliated which the Company provides. The Company processes such information in accordance with this Policy.

The Company reserves the right to collect and process personal information in the course of providing services to our clients without the knowledge of individuals involved.

- 2.1.4. As a general rule, the Company will not disclose personally identifiable information except when the Company is required or permitted per customer agreement, law (including pursuant to national security of law enforcement requirements) or otherwise, such as when the Company believes in good faith that the law requires disclosure or other circumstances outlined in this Privacy Policy require or permit disclosure.
 - The Company may share information with governmental agencies or other companies assisting in fraud prevention or investigation. The Company may do so when:
 - o permitted or required by law
 - o trying to protect against or prevent actual or potential fraud or unauthorized transactions
 - investigating fraud which has already taken place

This information, however, is not provided to these companies for marketing purposes.

2.1.5. The Company takes reasonable steps to protect personally identifiable information. To prevent unauthorized access or disclosure of personally identifiable information, maintain data accuracy, and support the appropriate use and confidentiality of personally identifiable information, either for its own purposes or on behalf of our clients, the Company has put in place appropriate physical, technical, and managerial procedures to safeguard and secure the personally identifiable information and data the Company possesses.



- 2.1.6. The Company collects and maintains personally identifiable information in a manner that is compatible with the purpose for which it was collected and maintained, or as subsequently authorized by an individual or client. To the extent necessary for such purposes, the Company takes reasonable steps to confirm that personal information is accurate and complete with regard to its intended use.
- 2.1.7. Whenever the Company is processing personal data, it will take reasonable steps to keep personal data accurate and up-to-date for the purposes for which they were collected. It will provide data subjects with the ability to exercise the following rights under the conditions and within the limits set forth in the law. If you wish to contact us regarding the use of your personal data or you want to object in whole or in part to the processing of your personal data, please contact us. If you have provided consent, you may withdraw consent. You may also request, subject to confidentiality obligations, to:
 - access your personal data as processed by the Company;
 - ask for correction or erasure of your personal data;
 - request portability, where applicable, of your personal data, i.e. that the personal data you have provided to the Company, are returned to you or transferred to the person of your choice, in a structured, commonly used and machine-readable format.
- 2.1.8. The Company utilizes a self-assessment approach to support compliance with this Privacy Policy.
 - The Company periodically verifies that related policies are accurate, comprehensive for the information intended to be covered, prominently displayed, implemented, and are in conformity with the principles of this Privacy Policy.
 - The Company encourages interested persons to raise any concerns with the Company. The Company will
 investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal
 information in accordance with the principles contained in this Privacy Policy.
 - If the Company determines an employee is in violation of this Privacy Policy, that employee will be subject to the Company's disciplinary process.
- 2.1.9. In the event that the Company merges, is acquired by or sells its assets to a third- party, the Company may disclose personally identifiable information as is reasonably necessary in connection with any such merger, acquisition or sale. Any such party with whom the Company merges or whom acquires some of all of the assets of the Company may not have the same or similar privacy guidelines as set forth in this Privacy Policy and may use personally identifiable information in a manner other than as set forth herein.
- 2.1.10. This Privacy Policy shall be reviewed annually and updated as necessary to comply with applicable regulations.
- 2.1.11. The Company will post any revised Privacy Policy on its website, or a similar website that replaces that website.
- 2.1.12. Information obtained from or relating to clients or former clients is further subject to the terms of any privacy notice provided to the client, any contract or other agreement with the client, and application enforcement laws.
- 2.1.13. The Company will cooperate with the appropriate regulatory authorities, including local data protection regulatory authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between the Company and an individual.



3. Other Covered Entities

The following U.S. subsidiaries of our organization are also adhering to the Privacy Policy:

- Bay Area Credit Services
- Exela Enterprise Solutions, Inc.
- SourceHOV, LLC
- BancTec, Inc.
- TransCentra, Inc.
- SourceHOV Healthcare, Inc.