

Privacy Policy

Last Revised: September 25, 2024

This Privacy Policy applies solely to information collected by Cross Country Computer on www.CrossCountryComputer.com and is designed to ensure that visitors to our website understand how and why we collect and use information provided by visitors. Cross Country Computer is subject to the supervisory and enforcement authority of the U.S. Federal Trade Commission (FTC).

Information Collection and Use

Cross Country Computer collects and stores the information you provide to us through our website. For instance, you provide information to us through registration and other forms we may ask you to complete. This may include such personal information as your name, the company you work for, business title, postal address, email address, telephone number, marketing preferences, and other information. We limit the information collected to that which is needed to respond to your request.

In addition, Cross Country Computer automatically collects certain information from your computer, such as your web browser, IP address and pages visited on our website. Cross Country Computer will not use your information except as described in this Policy in effect at the time of collection. As this Policy is revised, we note the new effective date above. If Cross Country Computer identifies new material purposes for the information already collected from you, we will seek your express consent prior to using the information we have already collected from you for any new purpose.

Cross Country Computer uses the information we collect to fulfill requests you have made to Cross Country Computer. We may also use your information to make our website easier for you to use and to inform you of service and product updates, new products and other related information from Cross Country Computer.

Cross Country Computer uses your browser information to analyze trends, administer our website, track user activity on our website and help us understand the parts of our website visited most often.

Cross Country Computer does not currently collect sensitive information (i.e. personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual). Should such sensitive personal information be provided to Cross Country Computer by a client then Cross Country Computer will only process such data consistent with our client's written instructions. Please see the section below titled "**A Note to Consumers about US Privacy Regulations & GDPR**" for additional explanation on how Cross Country Computer manages privacy requests in client engagements.

Affirmation Statement

Cross Country Computer Corp complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (Swiss-U.S. DPF) as set forth by the U.S. Department of Commerce. Cross Country Computer Corp has 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 in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Cross Country Computer Corp has 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 to view our certification, please visit <https://www.dataprivacyframework.gov/>

Information Sharing and Disclosure

Except as described in this Policy, Cross Country Computer does not share, sell, rent, loan, trade, lease or disclose your personal information to any third party without your prior consent.

To fulfill a particular request by you, the information you provide may be shared with Cross Country Computer vendors. An example would be NCOA (National Change of Address), where we send customer name and address information to another vendor upon client request. All Cross Country Computer vendors are committed to protecting your privacy and will uphold the commitments made in this Policy.

Cross Country Computer may share your information with another company in relation to a sale or consolidation of Cross Country Computer's assets, provided, however, that such companies agree to honor all of the privacy commitments set forth in this Policy.

We reserve the right to disclose your personal information as required by law, court order or other valid legal processes. Cross Country Computer could be required to release personal data in response to lawful requests from public authorities including to meet national security or law enforcement requirements.

Opt-Out of Cross Country Computer Corporate Communications

Cross Country Computer maintains an email newsletter subscription, blog and events list to communicate with our clients and prospects. Email addresses obtained via the website are done so when Individuals affirmatively ask to join our email list by opting-in on our website. All email messages sent to these lists include an opportunity to unsubscribe or opt-out of receiving future blogs, news and event alerts.

You may also request to be removed from our email marketing newsletter list and event alert list by contacting us via email at Inquiry@CrossCountryComputer.com or by following this link.

Cross Country Computer also maintains a postal mailing list to communicate with our clients and prospects. You can request to be removed from our mailing list by contacting us via email at Inquiry@CrossCountryComputer.com.

Access To and Correction of Personal Information

Cross Country Computer acknowledges the individual's right to access their personal data. To request access to and correction of the information we have about you or to request deletion of your personal information from our systems, please send a request via email to Inquiry@CrossCountryComputer.com. Cross Country Computer will respond within 30 days.

Cookies

Cookies are small text files that are stored by your web browser and store data to make your browsing experience easier and faster. We and our third party service providers who assist with managing our website use cookies, web beacons and similar technologies on our Sites.

Cookies Used by Cross Country Computer on Our Site

Performance Cookies: These cookies collect information about how visitors use our websites for web analytics purposes. An example would be the pages visitors go to most often and error messages received. Cross Country Computer uses Google Analytics for web analytics. All information collected by these cookies is anonymous; they do not collect information that identifies a visitor. These cookies are only used to improve how our website works and your experience on our website. By using our website, you agree that we can place these types of cookies on your device.

Modifying Your Browser Settings

You can modify your browser settings at any time, including setting your browser to notify you when you receive a cookie, giving you the choice to decide whether or not to accept it. If you reject cookies, you may still use our website.

Below are links to information on managing your cookie preferences with common browsers:

- Google Chrome: <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>
- Mozilla Firefox: <http://support.mozilla.org/en-US/kb/Enabling%20and%20disabling%20cookies>
- Microsoft Internet Explorer: <http://support.microsoft.com/kb/196955>
- Safari: <http://docs.info.apple.com/article.html?path=Safari/3.0/en/9277.html>
- To learn more about Google Analytics, including how to opt-out, please visit: <http://www.google.com/intl/en/analytics/privacyoverview.html>.
- For more information about cookies, please visit: <http://www.iabeurope.eu/cookies-faq.aspx>.

For any questions related to our web technologies, you may always contact us via email at Inquiry@CrossCountryComputer.com.

Security

Cross Country Computer uses physical, electronic and administrative safeguards designed to protect your personal information against loss, misuse or alteration. All information is stored securely and may only be accessed by employees with a legitimate business need to access the information.

Links to Third Party Sites

Our website contains links to third party sites. This Privacy Policy does not apply to the information collection and use practices of third party sites. We encourage you to review the privacy policies of any third party site you may link to from our website.

Participation in Cross Country Computer Online Forums

Our website provides you with the opportunity to participate in various Cross Country Computer online forums, for example, the Cross Country Computer Blog. If you contribute any content to a Cross Country Computer online forum, you grant Cross Country Computer Corp a world-wide, non-exclusive, royalty-free license (with the rights to sublicense) to use, copy, reproduce, process, adapt, modify, publish, transmit, display, and distribute your content in any and all media or distribution methods (now known or later developed) for any and all purposes.

Any content you post to a Cross Country Computer online forum may be publicly viewed and used by anyone on the internet. You are responsible for any content that you post, and for any consequence thereof, including the use of your content by others. To protect your privacy, Cross Country Computer reminds you not to submit personal information in a public forum.

You agree not to submit any information that (i) is unlawful, harmful, threatening, abusive, harassing, torturous, defamatory, vulgar, obscene, libelous, invasive of another's privacy, hateful or racially,

ethnically or otherwise objectionable; (ii) you do not have a right to make available under any law or under contractual or fiduciary relationships; (iii) infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party; or (iv) contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment.

Cross Country Computer may pre-screen, refuse, or remove any content that you post. We may also modify or adapt your content in order to transit, display or distribute it.

Cross Country Computer does not control the content posted by public users to our websites, and as such, does not guarantee the accuracy, integrity or quality of such content. Under no circumstances will Cross Country Computer be liable in any way for any user contributed content, including, but not limited to, any errors or omissions in any content, or any loss or damage of any kind incurred as a result of the use of any user-contributed content.

EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework, (Swiss-US DPF)

Cross Country Computer Corp complies with the EU-US Data Privacy Framework (EU-US DPF), the UK Extension to the EU-US DPF, and the Swiss-US Data Privacy Framework (Swiss-US DPF), as set forth by the US Department of Commerce regarding the collection, use and retention of personal information from the European Union, the UK (including Gibraltar), and/or Switzerland.

Cross Country Computer Corp has certified that it adheres to the Data Privacy Framework Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access and Resource, Enforcement and Liability. Pursuant to the DPF Principles, Cross Country Computer is liable up to our contractual limits for the transfer of EU, UK, and Swiss personal data to third parties acting as our agents unless we can prove we were not a party to the events giving rise to the damages. If there is any conflict between the policies in this privacy policy and the DPF Principles, the DPF Policies shall govern. To learn more about the Data Privacy Framework Program, and to view our certification page, please visit <https://www.dataprivacyframework.gov/>

In compliance with the EU-U.S Data Privacy Framework (EU-U.S DPF), the UK Extension to the EU-U.S DPF, and the Swiss-U.S Data Privacy Framework (Swiss-U.S DPF) Principles, Cross Country Computer Corp commits to resolve complaints about your privacy and our collection or use of your personal information transferred to the United States pursuant to the EU-U.S DPF, the UK extension to the EU-U.S DPF, and the Swiss-U.S Data Privacy Framework Principles. European Union, United Kingdom, and Swiss individuals with inquiries or complaints should first contact:

Cross Country Computer
Attn: Data Privacy Officer
Re: Privacy Policy
250 Carleton Avenue
E. Islip, NY 11730

Cross Country Computer Corp has further committed to refer unresolved privacy complaints under the Data Privacy Framework program to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit <https://bbbprograms.org/programs/all-programs/dpf-consumers/ProcessForConsumers> for more information and to file a complaint. This service is provided free of charge to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/G-Arbitration-Procedures-dpf?tabset-35584=2>

A Note to Consumers about US Privacy Regulations & GDPR

Cross Country Computer (CCC) takes privacy and security very seriously. We understand that some consumers may visit our website to understand our position regarding US Privacy Regulations and the European Union's General Data Protection Regulation (GDPR), with which we are compliant. The following section is written as if we are explaining to a consumer what we do, how we do it and what that consumer can do to best resolve their inquiry.

CCC does not collect personal information about consumers aside from a small list of professional business contacts that our own new business development team maintains to send infrequent communications about our own company's news and hours of operation. All CCC emails to this group include proper opt-out links.

In accordance with the various privacy laws, CCC is generally considered a Service Provider. Many of our clients send us some of their own customers and prospects so that we can help them understand and grow their business. This can include using programs to match name and address information to remove duplicates so that our client can send you a catalog or other offer promoting products that they believe you may be interested in. In this regard, we do handle and transmit consumer Personally Identifiable Information (PII), typically including your name, address and sometimes your email. CCC does not design the mail piece or print the mail sent. Neither does CCC take or fulfill the resulting orders, process physical returns or handle customer service calls. Importantly, we do not require or encourage clients to provide us with credit card numbers or bank account information because we do not process payments. Meaning, we only handle a subset of the data so that we can provide our portion of the services to our clients.

Any of your consumer opt-out or privacy requests must be sent directly to our clients – the company name associated with the mail or email that you received. Our client contracts generally prevent us from taking direction from anyone other than them. This is why our clients need to send us your request themselves. Depending on the nature of your request, our client may also need to remove your record from their own internal systems to avoid sending it to CCC again. In the event that you as a consumer contact CCC directly, then to help you we may request information on the specific promotion you received so that we can attempt to put you in touch with the right person at the proper company.

Sometimes a consumer (like you) may call the company that sent you a catalog and someone at that company may give you our name or number to call. While the person that you communicated with was likely well-intentioned, they just may not have realized that someone in their own organization has to be the one to contact us with the request (again, because we can't act on your consumer request directly).

Once we receive a request from our client, if our client asks us to change your preferences or identify and remove or correct data, then we make a best effort to do so using commercially reasonable techniques. If the information that we are being asked to change or remove is not sent to us in a manner similar to how we have it stored in our systems then it may not immediately be found. For example, maybe you have moved to a new address, or perhaps you used a different email when placing a prior order. If this happens, we take it seriously and will work hard with our client to resolve it. The more information you can provide to our client, the easier it will be.

Please note that it takes several months for a mailing to go from the planning stages to the execution and delivery stage. As a result, a request to be removed from a mailing list may take time in order to fully go into effect because campaigns can be in various stages of progression at any given time. There can also be cases where information exists on our backup systems and in those cases it 'ages off' in accordance with our normal and customary purge cycles. Consumers should contact the marketer again if a reasonable time has passed and you are still receiving mailings or emails.

Regarding European Union residents, the EU GDPR regulations set forth specific requirements. CCC does not provide products or services to EU citizens, but in connection with some of our client contracts

CCC may handle a limited amount of data belonging to EU citizens. As a 'service bureau', CCC is considered a 'Processor', taking direction from our client who is considered the 'Controller'. The 'Controller' tells CCC what to do and then in accordance with our contracts and within generally acceptable guidelines, CCC takes action to comply. Within our current client contracts, we offer to add terms so that we can help our clients satisfy their own GDPR obligations. For example, we agree to take appropriate measures to ensure security, cooperate with audits and help them allow consumers to manage their data rights. Because the GDPR framework has very strict guidelines, these representations allow us to comply with key US regulations as well.

Changes to This Policy

Cross Country Computer may revise this Privacy Policy from time to time. If we decide to change this Privacy Policy, we will post those changes here and other places we deem appropriate so that you are aware of what changes have been made in how we collect, use and disclose your information. You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Policy. You can determine when this Policy was last revised by checking the "Last Revised" legend at the top of this Policy.

Questions and Complaints

General questions about Cross Country Computer's Privacy Policy can be directed to Inquiry@CrossCountryComputer.com or to our physical address as noted below. If you wish to make a report (anonymously or otherwise) regarding items related to violations of our privacy policy, known or suspected data security incidents, breach notifications, fraud or ethical misconduct, please contact Dave Love, EVP and Chief Security/Data Privacy Officer at 631-851-4235, via email to dlove@crosscountrycomputer.com, or as hard copy correspondence to the below address:

Cross Country Computer Corp.
Attn: Data Privacy Officer
Re: Privacy Policy
250 Carleton Avenue
E. Islip, NY 11730