



VISCOSITY PRIVACY POLICY

Author:	Viscosity North America
Creation Date:	January 2020
Last Updated:	April 2026
Document Ref:	PrivacyPolicy
Version:	2026

1 DOCUMENT CONTROL

1.1 Change Record

Date	Author	Version	Change Reference
January 2020	Leisa Pitner	Final 2020	Created, revised and in use
February 2021	Leisa Pitner	Final 2021	Documentation review, no changes created at this time.
December 2022	Leisa Pitner	Final 2022	Documentation review, updated Corporate address
December 2023	Leisa Pitner	Final 2023	Documentation review, non-material edits
February 2025	Leisa Pitner	Final 2025	Documentation review, non-material edits
April 2026	Leisa Pitner	Final 2026	Documentation review, non-material edits

1.2 Reviewers

Date	Name	Position
January 2020	Charles Kim	CEO
January 2020	Justin Nugent	CSO
January 2020	Leisa Pitner	Director of Management and Coordination and Delivery Assurance
February 2021	Leisa Pitner	Director of Management and Coordination and Delivery Assurance
December 2022	Leisa Pitner	Director of Management and Coordination and Delivery Assurance
December 2023	Justin Nugent	CSO
February 2025	Justin Nugent	CSO
April 2026	Justin Nugent	CSO

Contents

1	Document Control	2
1.1	Change Record	2
1.2	Reviewers	2
2	Introduction	4
2.1	Purpose	4
2.2	Policy Statement.....	4
3	Personal and other information	6
3.1	How We Use and Share Information	6
3.2	Other Information.....	6
3.3	Access, Correction, and Profile Updates.....	7
3.4	Retention and Deletion.....	7
3.5	Security.....	7
3.6	Sensitive Information	8
4	WEB-BASed SECURITY.....	9
5	Contact us.....	14
5.1	Policy Updates.....	14
5.2	Exceptions	14
5.3	Approvers	14
5.4	Corporate Headquarters.....	14

2 INTRODUCTION

2.1 Purpose

Viscosity North America (“we”) respect your preferences concerning the treatment of Personal Information that we may collect. This privacy policy (“Policy”) lets you know how we collect and use your Personal Information, how you can control its use, and describes practices regarding information collected from our websites, through offline sales and marketing activities (collectively, the “Channels”).

The Channels may provide links to or the ability to connect with non-Viscosity websites, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share information about you. Those third-party websites or services are beyond our control. We encourage you to check the privacy policies and terms of use of any non-Viscosity websites or services before providing your Personal Information to them.

2.2 Policy Statement

All employees, consultants, and contractors must be provided supporting reference materials to allow them to properly protect and otherwise manage Viscosity policies. Materials should communicate that information security is an important part of Viscosity’s business and must be viewed like other on-going business functions such as accounting and marketing.

The Managing Partners are responsible for establishing and maintaining organization-wide information security policies, standards, guidelines, and procedures.

All employees are expected to be aware, familiarized, and in compliance with the boundaries of Privacy Policy when updates to the policy have been notified by email, web, or physical postings. Under no circumstance should there be any circumvention of Viscosity’s policy without the written approval of Viscosity Managing Partners, who serves as the governance for this policy. Non-compliance with this may result in disciplinary action up to and including termination.

2.2.0.1 Guiding Principles

- Senior Management is committed to and in support of the successful establishment and continuance of an information security management program.
- Policy is defined and published regarding information security management within Viscosity North America.
- All employees are made aware and required to adhere to defined security management standards.
- No less than annual audit will ensure compliance with the policy.
- Ensure the continued availability of information systems.
- Ensure the integrity of the information stored on computer systems.
- Preserve the confidentiality of sensitive data.
- Ensure conformity to applicable laws, regulations, and standards.
- Ensure adherence to trust and obligation requirements in relation to any information relating to an identified or identifiable individual in accordance with its privacy policy or applicable privacy laws and regulations.
- Preserve the confidentiality of sensitive data in store and in transit.

- Incident handling and response is documented managed, and assessed annually to confirm that response is conducted.

2.2.0.2 Governance

- This document is owned and managed by the Chief Security Officer and any changes to this policy require approval of that role holder. The document will be reviewed annually for validity against the current business direction.

3 PERSONAL AND OTHER INFORMATION

Personal Information may include, but is not limited to:

- Your name and physical address, email addresses, and telephone numbers
- Information about your company such as the name, size and location of your company and your role / title within the company
- Information obtained from third parties on your interests
- Past transactional behavior on the Channels Other Information May include, but is not limited to:
- Internet Protocol address ("IP address") and information derived from your IP address such as your geographic location
- Unique IDs such as a cookie placed on your computer, mobile or device IDs
- Behavioral data about your usage of the Channels, such as webpages clicked, websites and content areas visited, date and time of activities
- Information about your devices such as information contained in HTTP Headers (defined below) or other internet transfer protocol signals, browser or device type and version, operating system, user-agent strings, and information about or from the presence or use of "apps" on your mobile devices, screen resolution, and your preferred language
- The web search you used to locate and navigate to the Channels

3.1 How We Use and Share Information

Viscosity uses (only with agreement of the individual) the Personal Information it collects (unless otherwise restricted by applicable law). Under HIPPA/PCI/SOX/PHI, we do not collect, store, or share any information.

3.2 Other Information

We may use, transfer, and disclose Other Information we collect for any purpose, except where applicable law requires otherwise. If we are required to treat Other Information as Personal Information under applicable law, then we will only use it in the same way that we are permitted to use and disclose Personal Information.

3.3 Access, Correction, and Profile Updates

You may request to review, correct, update, suppress, or otherwise modify any of your Personal Information that you have previously provided to us through the Channels, or object to the use or processing of such Personal Information by us. Please contact us at the following address:

Privacy Officer, Viscosity North America
3016 Communications Parkway, Suite 200
Plano TX 75093

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information that you have provided to us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information that you have provided to us.

While most questions and issues related to access can be handled quickly, complex requests may take more research and time. In such cases, issues will be addressed, or you will be contacted regarding the nature of the problem and appropriate next steps, within thirty days.

3.4 Retention and Deletion

Viscosity will retain your Personal Information for as long as needed to provide you products or services; as needed for the purposes outlined in this Policy or at the time of collection; as necessary to comply with our legal obligations (e.g., to honor opt-outs), resolve disputes, and enforce our agreements; or to the extent permitted by law.

At the end of the retention period, Viscosity will delete your Personal Information in a manner designed to ensure that it cannot be reconstructed or read.

3.5 Security

The security of your Personal Information is important to Viscosity. We use physical, electronic, and administrative safeguards that are designed to protect your Personal Information from loss, misuse and unauthorized access, disclosure, alteration, and destruction.

If your Personal Information is acquired, or is believed to have been acquired, by an unauthorized person and applicable law requires notification, Viscosity will notify you by e-mail or mail. Viscosity will give you notice promptly, consistent with the reasonable needs of law enforcement and/or Viscosity to determine the scope of the breach and to investigate and restore the integrity of the data system.

3.6 Sensitive Information

We ask that you not send us, and you not share any sensitive Personal Information (e.g., government-issued, or financial account numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, genetic, or biometric data, criminal background, or trade union membership).

4 WEB-BASED SECURITY

4.1.1.1 Website Privacy Policy Introduction

Viscosity North America, a Texas corporation (“Company” or “We”) respect your privacy and are committed to protecting it through our compliance with this policy.

This policy describes the types of information we may collect from you or that you may provide when you visit the website www.viscositytechnology.com (our “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

- 1) This policy applies to information we collect on this Website.
- 2) It does not apply to information collected by:
 - a) us offline or through any other means, including on any other website operated by Company or any third party (including our affiliates and subsidiaries); or
 - b) any third party, including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this privacy policy. This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this Website after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

4.1.1.2 Children Under the Age of 18.

Our Website is not intended for children under 18 years of age. No one under age 18 may provide any information to or on the Website. We do not knowingly collect personal information from children under 18. If you are under 18, do not use or provide any information on this Website or on or through any of its features, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information.

4.1.1.3 Information We Collect About You and How We Collect It.

We collect various types of information from and about users of our Website, including information:

- 1) by which you may be personally identified, such as name, postal address, e-mail address, telephone number, or any other identifier by which you may be contacted online or offline (“personal information”).
- 2) that is about you but individually does not identify you; and/or
- 3) about your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- 4) Directly from you when you provide it to us.
- 5) Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- 6) From third parties, for example, our business partners.

4.1.1.4 Information You Provide to Us.

The information we collect on or through our Website may include:

- 1) Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to our service, posting material, or requesting further services. We may also ask you for information when you report a problem with our Website.
- 2) Records and copies of your correspondence (including email addresses) if you contact us.
- 3) Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- 4) Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, “posted”) on public areas of the Website or transmitted to other users of the Website or third parties (collectively, “User Contributions”). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that unauthorized persons will not view your User Contributions.

4.1.1.5 Information We Collect Through Automatic Data Collection Technologies.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- 1) Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- 2) Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking).

The information we collect automatically may include personal information, or we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- 3) Estimate our audience size and usage patterns.
- 4) Store information about your preferences, allowing us to customize our Website according to your individual interests.

- 5) Speed up your searches.
- 6) Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- 7) Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- 8) Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see [Choices About How We Use and Disclose Your Information](#).
- 9) Web Beacons. Pages of our the Website [and our e-mails] may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or [opened an email] and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

4.1.1.6 Third-Party Use of Cookies and Other Tracking Technologies.

Some content or applications, including advertisements, on the Website are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices About How We Use and Disclose Your Information](#).

4.1.1.7 How We Use Your Information.

We use information that we collect about you or that you provide to us, including any personal information:

- 1) To present the Viscosity Website and its contents to you.
- 2) To provide you with information, products, or services that you request from Viscosity.
- 3) To fulfill any other purpose for which you provide it.
- 4) To carry out our obligations and enforce our rights arising from any contracts entered into between you and Viscosity, including for billing and collection.
- 5) To notify you about changes to the Viscosity Website or any products or services Viscosity offers or provides through it.
- 6) To allow you to participate in interactive features on the Viscosity Website.
- 7) In any other way we may describe when you provide the information.

- 8) For any other purpose with your consent.
- 9) We may also use your information to contact you about [our own and third parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please check the relevant box located on the form on which we collect your data. For more information, see [Choices About How We Use and Disclose Your Information](#).
- 10) We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

4.1.1.8 Disclosure of Your Information.

- 1) We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.
- 2) We may disclose personal information that we collect, or you provide as described in this privacy policy:
 - a) To our subsidiaries and affiliates.
 - b) To contractors, service providers, and other third parties we use to support our business.
 - c) To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information about our Website users is among the assets transferred.
 - d) To fulfill the purpose for which you provide it.
 - e) For any other purpose disclosed by us when you provide the information.
 - f) With your consent.
- 3) We may also disclose your personal information:
 - a) To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
 - b) To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
 - c) If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

4.1.1.9 Choices About How We Use and Disclose Your Information.

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- 1) Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's [website](#). If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- 2) We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

4.1.1.10 Data Security.

- 1) We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.
- 2) The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.
- 3) Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

4.1.1.11 Changes to Our Privacy Policy.

It is our policy to post any changes we make to our privacy policy on this page [with a notice that the privacy policy has been updated on the Website home page]. If we make material changes to how we treat our users' personal information, we will notify you [by email to the [primary] email address specified in your account[[and/or] through a notice on the Website home page]]. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

4.1.1.12 Contact Information.

To ask questions or comment about this privacy policy and our privacy practices, contact us at: info@viscositytechnology.com

5 CONTACT US

If you have further questions related to this policy, please contact us. Written inquiries may be addressed to:

Chief Security Officer, Viscosity North America
3016 Communications Parkway, Suite 200
Plano TX 75093

5.1 Policy Updates

Viscosity reserves the right to amend Viscosity's Management and Coordination Policy at any time as deemed necessary to meet our business direction.

5.2 Exceptions

No exceptions to this policy will be allowed unless specifically granted by the employee's manager, and Viscosity Executive Management.

5.3 Approvers

Charles Kim, Founder and CEO
Jerry Ward, Co-Founder and COO
Justin Nugent, Co-Founder and CSO

5.4 Corporate Headquarters

Viscosity's corporate headquarters are located at:

3016 Communications Parkway, Suite 200
Plano TX 75093

Tel: +1.469-444-1380 or online at <http://www.viscosityna.com/contact-us/>