

QualiSystems USA Inc
Data Privacy Framework Program (“DPF”) Notice

Effective: March 8, 2026

QualiSystems USA, Inc. (“**Quali**”, “**We**” or “**Our**”) has certified with the EU-U.S DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF with respect to the Processing of Personal Data as further explained in Section 1 below. If there is any conflict between the terms in this Notice and the DPF principles, the DPF principles shall govern. To learn more about the DPF and its principles please visit <https://www.dataprivacyframework.gov/s/>.

Quali complies with the EU-U.S. Privacy DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of Personal Data transferred to the United States. Quali has certified to the Department of Commerce that it adheres to the DPF Principles and Our DPF certification is available [here](#).

1. DEFINITIONS.

“**Customer(s)**” means prospective, current, or former customers, or clients of Quali and Quali entities.

“**Personal Data**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

“**Processing**”, “**Process**” means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. SCOPE.

Quali's participation in the DPF applies to the Personal Data subject to EU, UK and Swiss data protection laws.

3. PURPOSES OF DATA PROCESSING.

Quali develops and markets software that allows you to create and deploy sandboxes that are replicas of infrastructure and application configurations and to use them for development, testing, demos, training and support. Quali products works by allowing you model, orchestrate, and deploy on-prem, cloud, and hybrid environments (the “**Service**”). Quali will Process the Personal Data it receives, for the purposes of offering and/or providing the Service to its Customers, including Personal Data that (i) We receive regarding Customers, Customers' customers or end-users, and business partners; and/or (ii) We collect and/or Process on behalf of, or, for the benefit of, Customers through and/or in the context of the Service or the contracts executed with Customers (including, without limitation, pre-contractual discussions). To fulfill these purposes, We may, without limitation, use the Personal Data to contact data subjects, to discuss or execute contracts, to provide the Service, to provide support and maintenance, to correct and address technical or service problems, for marketing purposes, to comply with applicable laws, regulations and orders from public authorities or courts and/or for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of- court procedures. The categories of Personal Data are, including, without limitation, the following: first name, last name, business address, phone number, email address, company, title, country, personal data included in the management of the Customer's project(s), payment information and business information and/or any other Personal Data or

information that the Quali's Customers provide or instruct Quali to Process in the context of Quali's Service. Quali has certified to the DoC that it adheres to the DPF Principles and Our DPF certification is available [here](#).

Quali complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and 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. Quali 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 and the United Kingdom in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. Quali 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/>

4. ONWARD TRANSFERS OF PERSONAL DATA.

Subject to Section 7 below, We will not transfer Personal Data originating in the EU and/or Switzerland to third parties unless such third parties have entered into an agreement in writing with us requiring them to provide at least the same level of protection to the Personal Data as required by the Principles of the EU-U.S. DPF, UK Extension to the EU-U.S. DPF' and the Swiss-U.S. DPF and/or applicable law. In cases of onward transfer to third parties of Personal Data received pursuant to the EU-U.S. DPF, UK Extension to the EU-U.S. DPF' and the Swiss-U.S. DPF, Quali is potentially liable. We may transfer Personal Data to third party processors, service providers, vendors, contractors, Quali entities, partners and agents (collectively "**Processors**") who need the information in order to provide services to or perform activities on Our behalf, fraud detection and prevention services, web analytics, e-mail distribution and monitoring services, amongst others. In addition, we may disclose or allow government and law enforcement officials access to Personal Data, in response to a subpoena, search warrant, or court order (or similar requirement), or in compliance with applicable laws and regulations, and/or if we believe in good faith that this will help protect the rights, property or personal safety of Quali, any of our partners, customers (including, their administrators and/or users), or any member of the general public. Also, we may share your Personal Data internally within our group of companies, when they have a need to know, and should Quali or any of its affiliates undergo any change in control or ownership, including by means of merger, acquisition, or purchase of substantially all or part of its assets, Personal Data may be shared with or transferred to the parties involved in such an event.

A description of the Processors provide and/or the activities that they perform are set out in the table below:

Service/Activity
User authentication
Support and customer success tools
Community
Training
CRM
Marketing
Cloud services
Log Management
Cloud-based file transfer
Online Surveys
Webinars
Incident management

Service status indication
In-app user enablement
Leads communications
Revenue operations
Web Security
Artificial tools and services

5. RIGHT TO ACCESS, CHANGE OR DELETE PERSONAL DATA.

Data subjects have the right to access, amend, and delete Personal Data about them, and in some cases to limit use and disclosure of their Personal Data. If you would like to request access to the Personal Data We have processed on behalf of one of the Customers, to request that we amend or delete such Personal Data, or to request that we limit our use or disclosure of your Personal Data, please contact privacy@quali.com and provide your name, contact information and observe the required formalities under applicable law. For more information, please visit [here](#) and/or [here](#).

Please be aware that in specific situations where fulfilling access or other requests might impose a disproportionate burden or expense, or potentially infringe upon the rights of others, we may be required to carefully review and, if permissible under applicable law, respectfully decline your request.

6. CHOICE.

If Personal Data covered by this Notice is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized, or is to be disclosed to a non-agent third party in a manner not specified in this Notice, Quali will provide you with an opportunity to choose whether to have your Personal Data so used or disclosed. Requests to opt out of such uses or disclosures of Personal Data should be sent to us as specified in the Section 8 below.

Certain Personal Data, such as information about medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, is considered "Sensitive Information". Quali does not currently collect sensitive Personal Data. To the extent that Quali collects such data in the future, Quali will do it in accordance with applicable laws and the DPF principles. For more information, please visit [here](#) and/or [here](#).

7. REQUIREMENT TO DISCLOSE.

Quali may be required in certain circumstances to disclose Personal Data in response to lawful requests by courts or public authorities, including to meet national security or law enforcement requirement.

8. INDEPENDENT RECOURSE MECHANISM.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF Principles, Quali commits to resolve complaints about Our collection and use of your Personal Data. EU, UK and Swiss individuals with inquiries or complaints regarding 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 should first contact Quali at: privacy@quali.com or by postal mail sent to:

QualiSystems USA Inc.
9430 Research Blvd,
Echelon I , suite 100
Austin, Texas 78759

In compliance with the EU-U.S. DPF, UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Quali commits to refer unresolved complaints concerning our handling of personal data

received in reliance on the EU-U.S. DPF, UK Extension to the EU-U.S. DPF' and the Swiss-U.S. DPF to JAMS, an alternative dispute resolution provider based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit <https://www.jamsadr.com/dpf-dispute-resolution> for more information or to file a complaint. The services of JAMS are provided at no cost to you.

9. U.S. FEDERAL TRADE COMMISSION ENFORCEMENT.

Quali is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC) to ensure compliance with the EU-US DPF, UK Extension to the EU-U.S. DPF' and the Swiss-U.S. DPF outlined in this notice.

10. ARBITRATION.

Under certain conditions, more fully described on the DPF website (available [here](#)), you may also be able to invoke binding arbitration to determine whether a participating organization has violated its obligations under the DPF principles as to that individual and whether any such violation remains fully or partially unremedied ("residual claims") after you approached us and you used the independent recourse mechanism. The International Centre for Dispute Resolution-American Arbitration Association ("ICDR-AAA") was selected by the U.S. Department of Commerce to administer arbitrations pursuant to and manage the arbitral fund. Please visit ICDR-AAA's [website](#) for more information.