



## PRIVACY SHIELD NOTICE

Effective Date: 15 February 2019

Mavenir Systems, Inc. and its affiliates (hereinafter: “Mavenir”, “we”, the “Company” or “our”) respect your concerns about privacy. This Notice sets out the privacy principles we follow with respect to transfers of personal data from the European Economic Area (“EEA”) to the United States, including personal data we receive from individuals residing in the EEA who visit our web and mobile sites or apps and/or who use any of our services or otherwise interact with us (“you”).

We adhere to the EU-US Privacy Shield Frameworks as administered by the US Department of Commerce regarding the collection, use and retention of personal data from European Union member countries. Mavenir Systems, Inc. certified adherence to and commits to apply the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability.

For purposes of enforcing compliance with the Privacy Shield, we are subject to the investigatory and enforcement authority of the US Federal Trade Commission.

For more information about the Privacy Shield, see the US Department of Commerce’s Privacy Shield website located at: <https://www.privacyshield.gov>. To review our certification on the Privacy Shield list, see the US Department of Commerce’s Privacy Shield self-certification list located at: <https://www.privacyshield.gov/list>

This Privacy Notice is applicable for the usage of our Rich Communication and Rich Business Messaging Solution (the “Mavenir Services”) which may leave the EU for processing data in the US.

The entity responsible for the collection and processing of your personal data in connection with the Service is **Mavenir Systems Limited** and other Mavenir US entities that may process personal data are: Mavenir Inc and Mavenir Networks Inc.

### Types of personal data we collect and use

Our online privacy notice located at <https://mavenir.com/data-privacy-notice> describes the categories of personal data we may receive in the United States, as well as the purposes for which we use that personal data. We will only process personal data in ways that are compatible with the purpose we collected it for, or for the purposes you later authorize. Before we use your personal data for a purpose that is materially different from the purpose, we collected it for or that you later authorized, we will provide you with the opportunity to opt-out. We maintain reasonable procedures to help ensure that personal data we collect and use is reliable for its intended use, accurate, complete and current.

### Data transfers to third parties

- **Business Partners**

We also provide information to our business partners such as to fulfill product and information requests, and to provide customers and prospective customers with information about us and our products and services.

- **Business transfers**

As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, personal data may be part of the transferred.

- **Disclosure for National Security or Law Enforcement**

Under certain circumstances, we may be required to disclose your personal data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

- **Legal Requirements**

We may disclose your personal data if required to do so by law in order to (for example) respond to a subpoena or request from law enforcement, a court or a government agency, or in the good faith belief that such action is necessary (a) to comply with a legal obligation, (b) to protect or defend our rights, interests or property or that of third parties, (c) to prevent or investigate possible wrongdoing in connection with the Services, (d) to act in urgent circumstances to protect the personal safety of Users of the Services or the public; or (e) to protect against legal liability.

For further information about how we disclose our personal data, please see our online privacy policy, located at <https://mavenir.com/data-privacy-notice>

- **Liability in case of onwards transfers to third parties**

Mavenir may transfer the personal data that we collect to recipients in countries other than the country in which the personal data originally was collected. Those countries may not have the same data protection laws as the country which initially provided the personal data. When we transfer personal data to recipients in other countries, we will protect that personal data as described in this Privacy Notice. We will comply with applicable legal requirements by providing adequate protection for the transfer of personal data to data recipients in countries outside of the European Economic Area (“EEA”). To the extent that these data recipients are in countries that have not been recognized by the European Commission as providing an adequate level of data protection, we ensure that appropriate safeguards aimed at ensuring such a level of data protection are in place, including by entering into the European Commission’s EU Standard Contractual Clauses with the data recipients, or ensuring that the data recipient has certified to the EU-U.S. Privacy Shield Framework, or has implemented Binding Corporate Rules.

*In the context of an onward transfer, Mavenir retains responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Mavenir shall remain liable under the Principles if its agent processes such personal information in a manner inconsistent with the Principles, unless the organization proves that it is not responsible for the event giving rise to the damage.”*

## Security

We maintain reasonable and appropriate security measures to protect personal data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in accordance with the Privacy Shield.

## Access rights

In general, when processing personal data to provide our services, we do so only on behalf of our customers and in accordance with their instructions. This means that if you wish to access any personal data, we process on behalf of a Mavenir customer and request that we correct, amend, delete it if it is inaccurate or processed in violation of Privacy Shield, you should contact that customer with your request. We will then help them to fulfil that request in accordance with their instructions.

Where we process personal data collected via our website or app or via our services for our own account management, billing or marketing purposes, you may have the right to access personal data that we hold about you and request that we correct,



amend, delete it if it is inaccurate or processed in violation of Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your personal data, you can submit a written request to the contact information provided below. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information.

## Your choice

You may choose to change personal data or cancel an account by contacting us using the contact details below. You can also unsubscribe from our marketing communications by following the instructions or unsubscribe mechanism in the e-mail message.

## Questions or Complaints

You can direct any questions or complaints about the use or disclosure of your personal data to us at [security@mavenir.com](mailto:security@mavenir.com). We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of personal data within 45 days of receiving your complaint.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our US-based third party dispute resolution provider (free of charge) at <https://www.jamsadr.com/eu-us-privacy-shield>

## Binding arbitration

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with us and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. To find out more about the Privacy Shield's binding arbitration scheme please see <http://www.privacyshield.gov/article?id=My-Rights-under-Privacy-Shield>

## How Mavenir Protects Personal Data

Mavenir maintains technical and organizational safeguards to ensure an appropriate level of security and confidentiality for your personal data, in accordance with Company policies and applicable legislation.

## Other Covered Entities

Other covered Mavenir entities which are part of this US Privacy Shield are:

- Mavenir Systems Inc
- Mavenir Inc.
- Mavenir Networks Inc.



## **Updates to Our Privacy Notice**

This Privacy Notice may be updated periodically to reflect changes in our privacy practices. Any changes will be made available to you via our customer portal.

## **How to Contact Us**

If you have any questions or would like to contact us regarding any of the foregoing, please contact:

Mavenir Systems, Inc.  
Attn: Legal department  
1700 International  
Parkway  
Richardson, TX75081  
United States