



KVH PRIVACY POLICY

Last Updated: January 2, 2025

Your privacy is important to KVH Industries, Inc. and its subsidiaries and affiliates (collectively “[KVH](#),” “[we](#),” “[us](#),” or “[our](#)”). KVH is a global company and we process your personal data when you interact with us by visiting our websites, purchasing or using our products and services, or participating in our partner program. We are the controller of your personal data. Every time we process your personal data we do so by fully respecting your privacy and your other rights and freedoms.

Introduction

KVH is a manufacturer of solutions that provide global high-speed Internet, television, and voice services via satellite to mobile users at sea and on land as well as a leading provider of commercially licensed entertainment including news, sports, movies, and music to commercial and leisure customers in the maritime, hotel, and retail markets.

In this Privacy Policy, when we talk about “[Personal Data](#)” we mean any information that is related to an identified or identifiable natural person (also known as a “data subject” or “consumer” under certain privacy laws). KVH is committed to protecting the privacy and security of your Personal Data.

This Privacy Policy explains our practices for collecting, using, maintaining, protecting, and disclosing Personal Data that we receive in connection with:

- Our websites (individually and collectively, our “[Website](#)”), including this website [kvh.com](#), [myKVH.com](#), [ir.kvh.com/](#), and customized customer websites;
- The services and products KVH makes available pursuant to agreements with subscribers, and their service providers and authorized users (individually and collectively the “[Services](#)”); and
- Our partner program, which includes authorized dealers and distributors and their staff.

Please read this Privacy Policy carefully. If any term in this Privacy Policy is unacceptable to you, please do not use our Website or the Services, or provide us with any Personal Data.

Also, please bear in mind that this Privacy Policy complements the [Terms of Use](#) and [Cookies Policy](#) posted on our Website. Use of our Website and the Services is conditioned upon your agreement to the Terms of Use and the Cookies Policy.

This Privacy Policy does not apply to any products, services, websites, mobile applications, or content (including advertising) offered by third parties or that may be linked to or from the Website. Data collected by these third parties is covered by their own privacy policies.

Who is Responsible for Your Personal Data?

The KVH entity that operates the Website you are visiting (or you are being invited to visit), or that is a party to the Services or partnership agreement is the controller with regard to the processing of your Personal Data.

Information We Collect

Depending on the context of your interactions with KVH and/or your relationship with us, we collect and use different types of Personal Data, which may include the following:

- Personal Details: Name, email address, telephone number, company name, job title, and other professional and employment information;
- Account information: Account login credentials such as username and password;
- Financial information: Billing and payment information (e.g., credit card or ACH account information);
- Location information: Data identifying the actual location of a physical address or connected device using information such as GPS data, geocodes, latitude and longitude information, and images of the various

locations, as well as data associated with or supplemented with location information you provide (such as a zip code);

- Device and other automatic information: IP address, browsing history, search history, and information regarding your interactions with a website, application, or advertisement;
- Job Applicant Information: If you have applied for a job or other position with us, we may also collect employment information such as your name, resume/CV, educational background, language and other skills, work experiences, and job references; and
- Communications: We may record our communications including phone calls and emails, such as when you contact us for support or provide us with feedback.

How We Collect Your Information

- Information collected directly from you: We may collect Personal Data that you provide to us when you use our Website or interact with us. For example, we may collect information when you browse through the Website, register or create an account, make an information request, or when you otherwise interact with us and provide your information via our Website.
- Information collected when using our Services: When we or our partners provide certain Services, we may obtain your physical location data. We may supplement this information with your disclosed information about your location (such as your ZIP or postal code) to provide you with content that may be of interest to you. If you provide information about other individuals authorized to use your subscriptions account, you represent you have permission from these individuals. KVH disclaims any legal duty to verify the accuracy or completeness of any Personal Data provided to KVH.
- Information automatically collected from you when you browse our Website: Through certain automatic data collection technologies employed by our Website, we collect non-personally identifiable information about you, including certain information about your equipment, browsing actions, and patterns, including details of your visits to our Website (e.g., traffic data, logs, other communication data, and resources that you access and use on our Website), information about your computer, mobile device, and internet connection (including your IP address, operating system, and browser type), and location data, which we collect to ensure you reside in a jurisdiction in which you are eligible for using our Website, to comply with relevant laws, and for fraud prevention purposes. For more details about this type of data collection, please refer to the [Cookies Policy](#) posted on our Website.
- Information collected from other sources: We may collect Personal Data about you from our affiliates and our partners and their service providers and contractors. For example, this may include your current job position, business address, company name, and position title provided by your employer. We also may obtain information you have made publicly available, including from websites and online services you use, consumer research platforms, and/or business contact databases.

Children's Information

We do not knowingly collect Personal Data on children under age 16 without the verifiable permission of a parent or guardian. The content of our Website and the Services are not intended for, or directed to, children under age 16. If you are under 16 years of age, then please do not use or access our Website or Services at any time or in any manner. If you have reason to believe that a child under the age of 16 has provided Personal Data to us, please contact us using the methods described in the "How to Contact Us" section below and we will endeavor to delete that information from our databases.

How We Use the Information We Collect and Our Legal Basis for Processing

The purposes for which we collect and use your Personal Data may vary depending on the type of relationship you have with us. KVH always collects and uses Personal Data according to the purpose limitation principle. The use of Personal Data for new purposes will be consistent with and meet your privacy expectations. Otherwise we will request your authorization.

We may collect Personal Data for the following purposes:

- To provide our Website and its contents to you, to communicate with you about our Website, to better tailor the Website to your interests, and to understand how you use the Website. The legal basis for these processing purposes is KVH's legitimate interest in recording your settings preferences, improving our Website, and in the context of customized websites, our legitimate interest in answering to your request for access to the customized website or your consent to receive an invitation to visit a customized website.
- To send you transactional or relationship messages, such as receipts, account notifications, customer service responses, and other administrative messages. The legal basis for this processing purpose is the performance of the agreement you entered with KVH and provision of the Services.
- To establish or activate your accounts, and manage our communications with you, including by providing appropriate technical support. The legal basis for this processing purpose is the performance of the agreement you entered with KVH and provision of the Services.
- To provide or improve Services requested by you, including in the context of your business relationship with us, and to perform our contractual obligations. The legal basis for this processing purpose is the performance of the agreement you entered with KVH and provision of the Services.
- To provide you with information or marketing materials, including promotional offers, that may be of interest to you. The legal basis for this processing purpose is, where applicable, KVH's legitimate interest to promote its services and products similar to the Services you have previously purchased from KVH or your consent to receive direct marketing communications based on your interest. However, you can opt out of these communications anytime and free of charge.
- For purposes related to the reorganization of KVH's capital and business activities, including mergers and acquisitions, takeovers, partial sales of business lines, capital increases, and reductions. The legal basis for this processing purpose is KVH's legitimate interest to reorganize its capital and business activities.
- To perform data analyses to determine Website and Service usage patterns and the effectiveness of our sales, marketing, and advertising. The legal basis for these processing purposes is KVH's legitimate interest to understand how you use the Website and Services and how sales, marketing, and advertising activities perform.
- For screening purposes before entering into an agreement with a client or partner. The legal basis justifying this processing is KVH's legal obligation to comply with AML/CFT legal requirements.
- To provide you with content that may be of interest to you, we collect your physical location data when you use our Services. For example, when using mini-VSAT or using myKVH.com, we collect data identifying the actual location of a physical address or connected device using information such as GPS data, geocodes, latitude and longitude information, and images of the various locations. We supplement this data with your disclosed information about your location (such as your ZIP or postal code). The legal basis of this purpose of processing is your consent to the use of your geolocation data.
- For business development purposes, including regarding the operation, evaluation, and improvement of our business. The legal basis for this processing purpose is KVH's legitimate interest to improve its Services and Website, and develop new products or services.
- To protect against, identify, and prevent fraud and other criminal activity, claims, and other liabilities. The legal basis for this processing purpose is KVH's legitimate interest in ensuring the security of its Website and Services and protecting its interests.
- To perform accounting, auditing, billing, reconciliation, and collection activities, including answering and documenting financial enquiries in connection with financial commitments (credit control). The legal basis for this processing purpose is KVH's legal obligation to comply with tax, accounting, and anti-fraud legal requirements that may vary depending on the local regulations. Without the required mandatory information, we would not be able to work with you or provide you our Services.

- To answer valid requests from public authorities, including to meet national security or law enforcement requirements. The legal basis for this processing purpose is KVH's legitimate interest in cooperating with public authorities or, where applicable, complying with its legal obligations to answer requests from public authorities.
- To protect its interests, including collecting evidence in relation to prelitigation or litigation, and recording incidents (e.g., injury, environmental, and property damage). The legal basis justifying this processing is KVH's legitimate interest to protect its interests.
- To comply with the law. The legal basis for this processing purpose is KVH's legitimate interest in satisfying its legal obligations.
- To receive services from third parties, including providers of services related to the operation and management of our Website, or in connection with the administration and support of the activities noted above. The legal basis for this processing purpose is KVH's legitimate interest in providing the Website and Services.

We may also use the information we obtain about you for other purposes but will provide specific notice or opt out at the time of collection.

Personal Data We Share

KVH authorizes access to your Personal Data only in cases where it is necessary, and such access is limited to the portion of Personal Data that is necessary to perform the purpose for which such access is granted. We may disclose your Personal Data as follows and as otherwise described in this Privacy Policy or at the time of collection:

- To third-party contractors, service providers, and other vendors that help us accomplish our business objectives and perform services for us, including email service providers, payment processors, fraud prevention vendors, analytics providers, and advertising partners;
- In the event that the business of KVH is transferred to another entity by way of merger, sale of the company's assets, or otherwise;
- To accountants, auditors, lawyers, and other outside professional advisors to KVH, subject to appropriate contractual obligations of confidentiality;
- Between and among KVH and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership;
- Where required by law, court order, or subpoena if we believe disclosure is in accordance with, or required by, applicable law or legal process or where necessary to prevent, detect, or prosecute criminal offenses or to protect the rights, property, and safety of KVH or others; and
- With your consent or at your direction.

We may also process and disclose information to third parties if the information has been de-identified or aggregated in a way so it cannot be used to identify you.

Choices Regarding Promotional Emails/Marketing Communications

When you provide Personal Data to us on our Website, we will give you the opportunity to opt in to receive promotional and marketing information from KVH and/or selected third parties. In addition, in each communication you will be provided with the option to opt out by clicking on the unsubscribe link. You may also change your preferences and choose not to receive any marketing communications from us by emailing us at privacy@kvh.com, and we will honor your request. Also, please note that you may continue to receive materials while we are updating our lists.

Retention Periods

According to our retention policy, we only keep Personal Data in our records as long as they are necessary for the purposes they have been processed. KVH adheres to our retention policy to determine how long we retain data, including Personal Data. The retention periods are established considering our legitimate business purposes and according to local regulations such as tax, employment law, and other commercial regulations.

Additional Information for Residents of California

The California Consumer Privacy Act, as amended by the California Privacy Rights Act (Civil Code Section 1798.100, et seq.) ("California Law"), provides eligible California residents with specific rights with respect to our collection, retention, disclosing, selling, sharing, and use of Personal Data (also know as "Personal Information"). This section on Additional Information for Residents of California supplements this Privacy Policy and applies solely to eligible residents of the State of California. Any terms used but not defined in this section have the same meaning as defined in California Law.

Collection of Personal Information

In the preceding twelve (12) months, we have collected categories of Personal Information as discussed in the section titled "Information We Collect" from the sources of Personal Information as discussed in the section titled "How We Collect Your Information." The business or commercial purpose for collecting that information is disclosed in the section titled "How We Use the Information We Collect and Our Legal Basis for Processing."

Disclosure of Personal Information

In the preceding twelve (12) months, we may have disclosed your Personal Information for a business or commercial purpose described in the section titled "How We Use the Information We Collect and Our Legal Basis for Processing" to the categories of third parties described in the section titled "Personal Data We Share."

California Privacy Rights

California Law provides consumers with specific rights regarding their Personal Information. The following section describes your California Law rights and explains how to exercise those rights. Your California Law rights include the:

- **Right to Know or Access:** Request that we disclose to you your Personal Information that we collected, used, disclosed, shared, and sold.
- **Right to Delete:** Request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see "Identity Verification"), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.
- **Right to Correct Inaccurate Personal Information:** Request that we correct any of your Personal Information that we maintain about you that is inaccurate.
- **Right to Non-Discrimination:** We will not discriminate against you for choosing to exercise any of your rights. If you exercise certain rights, understand that you may be unable to use or access certain features of the Website.

Exercising Your Rights

To exercise your California privacy rights, please submit a request by filling out the form at <https://www.kvh.com/legal/consumer-privacy-rights/> or contacting us via the methods described in the "How to Contact Us" section.

Identify Verification

We may require you to prove your identity to exercise certain rights. Depending on your request, we will ask for information such as your name, your telephone number, email address, and/or date of last communication with us. We may also ask you to provide a signed declaration confirming your identity. We will only use Personal Information provided in your consumer request to verify your identity or authority to make the request.

Only you, your parent, guardian (if you are under 13 years or age), conservator, a person to whom you have given power of attorney, or an authorized agent may make a verifiable consumer request related to your Personal Information. You may, however, make a verifiable consumer request on behalf of your minor child if necessary. Your verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected Personal Information or an authorized representative. We cannot respond to your request if we cannot verify your identity or authority to make the request. You may only make a verifiable consumer request for your right to access twice within a 12-month period.

Data Retention

We retain your Personal Information so long as necessary for the purposes for which it was collected or otherwise processed. When determining the retention period, we take into account criteria, such as the type of Services requested by or provided to you, the nature and length of our relationship with you, use of our Website, and the impact on the Website functionality if we delete your Personal Information.

Disclosure to Third Parties

In addition to your rights under California Law, under California Civil Code sections 1798.83-1798.84, also known as the "Shine the Light Law," California residents who use our Website are entitled to request and receive once a year, free of charge, a notice from us describing what categories of Personal Information we share with third parties for their direct marketing purposes. As indicated above, such sharing only takes place with your consent. That notice will identify the categories of information shared, the third parties and affiliates with which it was shared, and their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the contact address provided below. In your request, please specify that you want a "California Privacy Rights Notice." Please allow at least thirty (30) days for a response.

Do Not Track Notice

Except as described in the [Cookies Policy](#), we do not track Website visitors over time and across third-party websites to provide targeted advertising and therefore our Website does not respond to Do Not Track ("DNT") signals. You may opt out of tracking as described in the Cookies Policy. However, some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your web browser may allow you to set the DNT signal so that third parties (particularly advertisers) know you do not want to be tracked. Third parties that have content embedded on KVH's websites such as a social feature or a stock ticker may set cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific KVH website from a certain IP address. Third parties cannot collect any other Personal Information from KVH's websites unless you provide it to them directly.

Additional Information for Residents of Texas

For eligible residents of Texas, you also have rights with respect to the Personal Data that we collect about you. This section supplements this Privacy Policy and applies solely to eligible residents of Texas. Any terms not defined in this section have the same meaning as defined under the Texas Data Privacy and Security Act (Tex. Bus. & Com. Code §§ 541.001 to 541.205). Subject to certain exceptions, if you are an eligible resident of Texas, you have certain privacy rights which include:

- **Right to Know/Access:** You have the right to confirm whether we process your Personal Data and access such Personal Data. You also have the right to obtain your Personal Data in a portable, and to the extent technically feasible, readily usable format that you can transmit without hinderance.

- **Right to Delete:** You have the right to request that we delete the Personal Data you have provided to us or that we have otherwise obtained about you.
- **Right to Correct:** You have the right to request that we correct inaccuracies in your Personal Data, taking into account the nature of the Personal Data and the purposes of the processing of your Personal Data.
- **Right to Opt Out:** You have the right to opt out of the processing of your Personal Data for the purposes of (i) targeted advertising, (ii) the sale of your Personal Data and (iii) profiling in furtherance of decisions that produce legal or similarly significant effects. Please note that we do not engage in such profiling as defined under applicable law.
- **Right to Appeal:** You have the right to appeal our decision with regard to your request to exercise any rights described herein.

You do not need to create an account with us to exercise your Texas privacy law rights. To exercise the rights described in this section, including your opt-out rights, please submit a consumer request to us by filling out the form at <https://www.kvh.com/legal/consumer-privacy-rights/> or contacting us via the methods in the “How to Contact Us” section.

Additional Information for Residents of the EEA, United Kingdom, and Switzerland

Eligible residents of the European Union/European Economic Area may also exercise certain rights with respect to their Personal Data, as afforded to them by applicable law and regulation. If you have any inquiries or to exercise your rights and choices listed below, write to privacy@kvh.com or contact us through our postal address or by telephone (details provided below). Please be aware that to protect your security and privacy, KVH may take reasonable steps to verify your identity prior to making changes to your Personal Data. Modifying or deleting your Personal Data may affect our ability to provide services to you.

- **Right to access your own Personal Data:** You have the right to obtain confirmation of whether and how we process your Personal Data, as well as the right to obtain a copy of this data.
- **Erasure, correction, objection, and other requests:** You have the right to obtain erasure and correction of your Personal Data, under certain conditions. You may also object at any time to the processing of your Personal Data, based on your specific situation. In this case, we will assess your request and provide a reply in a timely manner, according to our legal obligations. For all the processing operations that are based on your consent, you can withdraw it at any time, and we will stop those processing operations.
- **Marketing Practices:** KVH does not engage in any automated decision making using your Personal Data. However, we may use our marketing automation software to determine your level of interest in our Services for further engagement. We combine information collected through the use of cookies on our Website, such as IP address, with other information you provide us through webforms, by email, or during trade shows to determine your interests in our Services, so we can provide you with more relevant information about our Services when we send you email marketing communications. We ask your consent to conduct these activities and you have the right to withdraw it at any time.
- **Right to portability:** You have the right to obtain a copy or the transfer of your Personal Data you shared with us, in a structured or commonly used and machine-readable format where technically feasible where we collected your data based on a contract or your consent.
- **Right to lodge a complaint with a supervisory authority:** You have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work, or place of the alleged infringement, if you are not satisfied with our response.

Cross-Border Transfers

KVH is a global organization and provides global services. Sharing information cross border is essential so that you receive the same high-quality service wherever you are in the world. Accordingly, when you interact with our Website, purchase or use our Services, or otherwise interact with us, then your Personal Data may be transferred to, accessed from, and stored in servers and facilities located outside the country where you live as may be necessary for the

purposes described in this Privacy Policy, including in the United States. (Please see the following section for more information about the Data Privacy Framework.)

When we transfer, store, and process your Personal Data outside your country of residence, we will protect that information as described in this Privacy Policy and in accordance with applicable law. We have implemented appropriate safeguards to provide adequate level of data protection, which includes using contractual protections for the transfer of Personal Data from the EEA (including, for example, the European Commission's standard contractual clauses). In addition, we have self-certified under the Data Privacy Framework, and abide by the principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity, Access, and Enforcement with respect to the EEA/UK/Swiss Personal Data that we receive while we are a participant of the Data Privacy Framework. You may obtain a copy of said appropriate safeguards by writing to KVH using the contact details contained in the "How to Contact Us" section below.

When you purchase or use any Service, access the Website, or otherwise interact with KVH, you understand that we may transfer your Personal Data globally to KVH entities, affiliates, or subsidiaries, as well as third-party service providers and vendors.

Data Privacy Framework

As mentioned above, KVH 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 (collectively, "Data Privacy Framework") regarding the collection, use, and retention of Personal Data transferred from the European Union, Switzerland, and the United Kingdom to the United States. KVH has certified to the 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. KVH has certified to the 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. The EU-U.S. DPF Principles and Swiss-U.S. DPF Principles are collectively referred to as the "Data Privacy Framework Principles" herein. 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 Data Privacy Principles shall govern. To learn more about the Data Privacy Framework program, and to view our certification, please visit the Data Privacy Framework website located at <https://www.dataprivacyframework.gov>.

KVH processes all the Personal Data we receive in the United States from the EU, the EEA, Switzerland, and the United Kingdom in accordance with the following Data Privacy Framework Principles:

- Notice: Through this Privacy Policy and when we collect your Personal Data, we provide you with complete information about how we process your Personal Data and our commitment to the Data Privacy Framework Principles;
- Choices and Access: We provide you with different Choices, including the possibility to opt out before disclosing your Personal Data to a third party or if we intend to use it for unrelated purposes and the right of access to your own Personal Data;
- Accountability for Onward Transfers: When your Personal Data is transferred to another organization, we take appropriate steps to sign the necessary contractual agreements to protect your Personal Data;
- Security: We maintain reasonable and appropriate Security measures to protect your Personal Data from loss, misuse and unauthorized access, disclosures, alteration, or destruction;
- Data Integrity and Purpose Limitation: We only process Personal Data necessary for the relevant purposes of the processing;
- Data Retention: We keep Personal Data for no longer than is necessary to fulfill the defined purposes for which the Personal Data is processed; and
- Recourse, Enforcement, and Liability: We provide different mechanisms for assuring compliance with these Principles according to the sections below (Dispute resolution mechanisms and Enforcement and compliance).

Your Rights

- Right of access: You have the right to access your own data that has been transferred to KVH under the Data Privacy Framework.

- **Right of correction:** You can request the correction, or amendment of your Personal Data to keep the information accurate and up to date.
- **Right to delete:** You have the right to delete your Personal Data when it is no longer needed and there is no other legal ground that justifies its retention.

Disclosures and sharing of data

In accordance with our policy regarding disclosure and sharing of data, your Personal Data will only be shared as appropriate with third parties that process information on behalf of, or with, KVH. KVH employs contractual provisions with third parties to safeguard your Personal Data in accordance with this Privacy Policy and applicable law. Under certain circumstances, KVH in the U.S. may remain liable for the acts of these third parties if they process Personal Data in a manner that is inconsistent with the Data Privacy Framework Principles or applicable data protection law. KVH may also remain liable under the Data Privacy Framework Principles if the company's third-party processor onward transfer recipients process relevant Personal Data in a manner inconsistent with the Data Privacy Framework Principles, unless KVH proves that it is not responsible for the event giving rise to the damage.

Dispute resolution mechanisms

Complaint handling mechanism: In compliance with the Data Privacy Framework, KVH commits to resolve Data Privacy Framework Principles-related complaints about our collection and use of your Personal Data. EU, UK, and Swiss individuals with inquiries or complaints about our Data Privacy Framework policy or our handling of your Personal Data received in reliance on the Data Privacy Framework, should first contact us by writing to the following address and we will respond to your inquiry promptly:

Attn. Felise Feingold

Senior Vice President, General Counsel and Compliance Officer
privacy@kvh.com
 KVH Industries, Inc.
 50 Enterprise Center
 Middletown, RI 02842 USA

Recourse to Arbitration: In compliance with the Data Privacy Framework, KVH commits to refer unresolved complaints concerning our handling of Personal Data received in reliance on the Data Privacy Framework to the American Arbitration Association's International Centre for Dispute Resolution, an alternative dispute resolution provider located in the United States. If, after attempting to address privacy questions or concerns with KVH, you do not receive timely acknowledgment of your Data Privacy Framework Principles-related complaint from us, or if we have not addressed your Data Privacy Framework Principles-related complaint to your satisfaction, please visit https://go.adr.org/dpf_irm.html for more information or to file a complaint. The services of the American Arbitration Association are provided at no cost to you, and you can submit your unresolved privacy concern to the following address:

International Centre for Dispute Resolution

1101 Laurel Oak Road, Suite 100
 Voorhees, NJ 08043
 212.484.4181: Phone
casefiling@adr.org: Email
https://go.adr.org/dpf_irm.html: Website

Contact your Data Protection Authority: If you are based in the EU or the EEA, you may choose to contact your local Data Protection Authority ("DPA"), or the Swiss Federal Data Protection and Information Commissioner ("FDPIC"), if you are based in Switzerland. If you are based in the United Kingdom, you can choose to contact the UK Information Commissioner's Office ("ICO") or the Gibraltar Regulatory Authority ("GRA"), as applicable. Your DPA, the FDPIC, the ICO, or the GRA may refer your complaint directly to the Department of Commerce on your behalf. In this case, the Data Privacy Framework Team will then work to resolve your concern.

US Department of Commerce's Data Privacy Framework: You may also have the option to invoke binding arbitration for complaints regarding Data Privacy Framework compliance not resolved by any of the other dispute resolution mechanisms outlined above. For more information on binding arbitration, see <https://www.dataprivacyframework.gov/framework-article/ANNEX-I-introduction>.

Enforcement and compliance

KVH is subject to the investigatory and enforcement authority of the U.S. Federal Trade Commission, which has jurisdiction over KVH's compliance with the Data Privacy Framework. For more information, please visit the Data Privacy Framework page on the U.S. Federal Trade Commission [website](#).

If there is any conflict between the terms in this Privacy Policy and the Data Privacy Framework Principles, the Privacy Framework Principles shall govern.

Security

KVH is committed to the security, confidentiality, and integrity principles. We are committed to processing your data in a secure manner and have put in place commercially reasonable security measures to prevent the Personal Data we hold from being accidentally or deliberately compromised.

KVH uses industry standard administrative, technical, and physical safeguards designed to protect the Personal Data you provide against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use. KVH's websites [kvh.com](#) and [kvhmobileworld.com](#) are SSL certified websites. SSL certificates are small data files that digitally bind an encryption key to a particular organization. KVH's SSL certificates allow a secure connection from a web server to our browser.

We also conduct information risk assessments. We ensure that our staff understands the importance of protecting Personal Data, and we are responsibly managing access rights within the company. We include both physical security and IT security in our overall data security approach. We are diligent in selecting vendors that process Personal Data on our behalf so that they also ensure appropriate technical and organizational measures to protect the data.

KVH makes reasonable efforts to notify individuals and regulatory authorities, as required by law, if we reasonably believe that Personal Data has been stolen, disclosed, altered, or infringed by an unauthorized person. We create and maintain a breach notification and reporting protocols.

We also endorse the concept of privacy by design which is an approach to projects that promotes privacy and data protection compliance from the outset. This means considering the privacy and security implications for any new project or process throughout its lifecycle.

Despite these security measures, you should be aware that it is impossible to guarantee absolute security with respect to information sent through the Internet.

Changes to the Privacy Policy

This Privacy Policy is subject to change from time to time. KVH will endeavor to post a notice of any changes to this Privacy Policy for a period of thirty (30) days following any such modifications. The time stamp you see on the Privacy Policy will indicate the last date it was revised.

Severability Clause

If any term or provision of this Privacy Policy shall be found to be invalid, illegal, or otherwise unenforceable, such finding shall not affect the other terms or provisions of this Privacy Policy, or the whole of this Privacy Policy, but such term or provision shall be deemed modified to the extent necessary to render such term or provision enforceable, and the rights and obligations of you and KVH shall be construed and enforced accordingly, preserving to the fullest permissible extent the intent and agreements set forth in this Privacy Policy.

How to Contact Us

At KVH we are committed to apply this Privacy Policy. For this reason, if you have any privacy concern or questions about how your Personal Data is used, please feel free to contact us by email at privacy@kvh.com, or by mail or telephone:

If you are located in the United States:

Felise Feingold
Senior Vice President, General Counsel & Compliance Officer
KVH Industries, Inc.
50 Enterprise Center
Middletown, RI 02842 USA
401-847-3327

If you are located in Europe:

Felise Feingold
Senior Vice President, General Counsel & Compliance Officer
KVH Industries A/S
Birkerød Kongevej 150B
3460 Birkerød, Denmark
+1 401-847-3327