

# California Consumer Privacy Act Disclosures

In these California Consumer Privacy Act Disclosures ("CCPA Disclosures"), we, TXOne Networks Incorporated ("TXOne Networks"), disclose information about our data processing practices in the format and with the terminology contemplated by the California Consumer Privacy Act of 2018 ("CCPA"). Given the fact that these disclosures are crafted to address specific disclosure requirements in CCPA with specific terminology prescribed by the statute, these disclosures must not be read out of context of CCPA and its scope limitations.

## I. Who and what information is subject to these CCPA Disclosures?

California residents are protected as "consumers" by the California Consumer Privacy Act of 2018 ("CCPA") with respect to personal information.

A number of statutory exceptions apply under the CCPA and to these CCPA Disclosures, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between the business and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person's personal information is collected and used by the business solely within the context of the natural person's role or former role as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or a contractor of that business
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file
- (4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

## II. How can a consumer with a disability access these CCPA Disclosures?

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this notice.

### **III. CCPA Notice at Collection Online**

In this CCPA Notice at Collection Online, we are addressing disclosure requirements under California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of online collection:

We collect the following categories of personal information about consumers for the following purposes:

Upon ordering, purchasing, installing, activating or using our Products, we receive personal information such as:

- Name
- Phone number
- Email address
- Device ID
- Operating system
- License Key

We use this personal information to ensure that the relevant Customer's license to our solutions is valid and to contact our Customers regarding renewals, technical issues and new Product information.

The following types of information and personal information are processed when using and interacting with our Products and Services, including Customer support. The specific information and personal information that is provided automatically will depend on the particular Product or Services used. These types of information and personal information enables users to participate, share and leverage TXOne Networks' global database of threat related intelligence to rapidly identify and defend against potential threats within each Customer's unique network environment, as described in more detail below, as well as enabling us to provide any support requested.

- Product information, such as MAC address, device ID
- Public IP address of the user's gateway to the internet
- Mobile/PC environment
- Metadata from suspicious executable files
- URLs, Domains and IP addresses of websites visited
- Metadata of user/device managed by gateway Product
- Application behaviors

- Personal information contained within email content or files to which TXOne Networks is provided access
- Behaviors of Product users
- Information from suspicious email, including sender and receiver email address, and attachments
- Detected malicious file information
- Detected malicious network connection information
- Debug logs
- Network Architecture/Topology
- Screen capture of errors

## IV. CCPA Privacy Policy

Beyond the disclosures in the preceding "Notice At Collection Online" segment, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA and regulations of the California Attorney General, including §999.308 (Privacy Policy).

### 1. Right to Know About Personal Information Collected, Disclosed, or Sold

This Supplemental CCPA Privacy Policy describes the personal information we generally collect, use, disclose and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose and sell about you specifically ("right to know"). To submit a request to exercise the right to know, please submit an email request to [info@txone.com](mailto:info@txone.com) and include "California Request to Know" in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We will ask that you provide certain information to verify your identity. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. We will respond to your request in accordance with the CCPA. If we deny requests, we will explain why.

### 2. Our Personal Information Handling Practices in 2019

We have set out below the categories of personal information we have collected about California residents in the preceding 12 months and, for each category of personal information collected, the categories of sources from which that information was collected, the business or commercial purposes

for which the information was collected, and the categories of third parties with whom we shared the personal information.

<b>Category of personal information</b>	<b>We collected such personal information to use for the following business or commercial purposes:</b>	<b>We have collected such personal information from the following categories of sources:</b>	<b>We shared such personal information with the following categories of third parties:</b>
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	<p>To provide a more customized web experience and to understand site usage and improve the content and offerings of the site.</p> <p>To provide our Customers with new product information or technical alerts and to keep Customers informed about our products, services, promotions and special offers.</p> <p>To ensure that the Customer's license to our solutions is valid and to contact Customers regarding renewals and contractual and technical issues</p> <p>To perform security and threat detection relating to our services and functions</p>	Directly from the California resident, from third party sources such as distributors/reseller or partners	Cloud hosting service providers processing data on our behalf, e-commerce reseller, contractors
Any categories of personal information described in subdivision (e) of Section 1798.80: "Personal information" means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual,	<p>For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities;</p> <p>For employee onboarding;</p>	Directly from the California resident, from third party sources such as distributors/reseller or partners	Cloud hosting service providers processing data on our behalf

including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. "Personal information" does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records."	To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about TXOne Networks and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services.		
Characteristics of protected classifications under California or federal law, including age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities; For employee onboarding	Directly from the California resident	Cloud hosting service providers processing data on our behalf,
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about TXOne Networks and our services, establish and maintain a	Directly from the California resident	Cloud hosting service providers processing data on our behalf

	well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services;		
Biometric information.	N/A		
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.	To make contacts with you by telephone, email, or ground mail, to provide you with information and advertisements about TXOne Networks and our services, establish and maintain a well-managed customer or prospective customer relationship, and to evaluate, develop, and improve our services;  To provide a more customized web experience and to understand site usage and improve the content and offerings of the site;	Directly from the California resident	Cloud hosting service providers processing data on our behalf
Geolocation data.	Certain products may collect this information to provide location based feature or localized product features and information	Directly from the California resident	Cloud hosting service providers processing data on our behalf
Audio, electronic, visual, thermal, olfactory, or similar information.	N/A		
Professional or employment-related information.	For the purposes of recruitment and evaluations of qualifications for possible employment or	Directly from the California resident; from third party	Cloud hosting service providers processing data on

	internship possibilities; For employee onboarding;	employment recruiter	our behalf
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).	For the purposes of recruitment and evaluations of qualifications for possible employment or internship possibilities; For employee onboarding;	Directly from the California resident; from third party employment recruiter	Cloud hosting service providers processing data on our behalf
Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	For the purposes of assessing the suitability of an employment candidate or existing employee for employment positions or work duties.	Directly from the California resident; from third party employment recruiter; from the California resident's current and past employment managers and co-workers within TXOne Networks.	Cloud hosting service providers processing data on our behalf

### 3. Disclosures of Personal Information, No Sale

Over the preceding 12 months, we disclosed certain categories of California residents' personal information to the categories of third parties as shown in the table above. We did not sell personal information.

We do not and will not sell California residents' personal information. We do not sell the personal information of minors under 16 years of age without affirmative authorization.

### 4. Right to Request Deletion of Personal Information

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please submit an email request to [info@txone.com](mailto:info@txone.com) and include "California Request to Delete" in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information as required by the CCPA.

We may ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal

information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## **5. Right to Opt-Out of the Sale of Personal Information**

You have the right to opt-out of the sale of your personal information by a business. We do not, and will not, sell your personal information.

## **6. Right to Non-Discrimination for the Exercise of a Consumer's Privacy Rights**

You may not be discriminated against because you exercise any of your rights under the CCPA in violation of Cal. Civ. Code §1798.125.

## **7. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Mail your written declaration authorizing the authorized agent to act on your behalf, certified by a California notary public, to
- 5F., No. 6, Lixing 6<sup>th</sup> Rd., East Dist., Hsinchu City 300, Taiwan (R.O.C.); and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps and we will respond to any request from such authorized agent in accordance with the CCPA.

## **8. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: [info@txone.com](mailto:info@txone.com)

Postal address: 5F., No. 6, Lixing 6<sup>th</sup> Rd., East Dist., Hsinchu City 300, Taiwan (R.O.C.)