

OPSWAT Inc. California Consumer Privacy Act Notice

Last Updated: December 30, 2022

This California Consumer Privacy Act Notice for Employees (“**Notice**”) is provided by OPSWAT Inc. (“**OPSWAT**”, “**we**”, “**us**”, and “**our**”). This Notice explains how we collect, use, and disclose personal information about you as a California resident (“**you**” or “**your**”). This Notice also explains the rights you have under the California Consumer Privacy Act, as amended by the California Privacy Rights Act (collectively, “**CCPA**”).

If you are an employee of OPSWAT (or a contractor and agents acting in a similar role) or a candidate applying for a job at OPSWAT, please refer to our CCPA Notice for Employees and Job Candidates available at <https://www.opswat.com/legal>.

For the purpose of this Notice:

- “**Personal information**” is information that identifies, relates to, or could reasonably be linked with a particular California resident or household.
- “**Sensitive personal information**” is a sub-category of personal information including:
 - Government identifiers (e.g., Social Security, driver's license, state identification card, or passport number)
 - Complete account access credentials (i.e., user names, account numbers, or card numbers combined with required access/security code or password);
 - Precise geolocation;
 - Racial or ethnic origin, religious or philosophical beliefs, or union membership;
 - Mail, email, and text messages contents, unless the business is the intended recipient of the communication;
 - Genetic data;
 - Unique identifying biometric information; or
 - Health, sex life, or sexual orientation information.

1. Categories of Personal Information We Collect

We have collected the following categories of personal information within the last twelve (12) months:

Category	Types of Personal Information Collected
A. Identifiers	Real name, alias, postal address, telephone number, online identifier, internet protocol address, email address, account name, and signature.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Name, signature, address, telephone number, job title, and place of employment. To the extent you pay for services using your corporate or personal credit card, such information may be processed by our third-party payment processor. Some personal information included in this category may overlap with other categories.
D. Commercial information	Records of OPSWAT products or services purchased, obtained, or considered.
F. Internet or other electronic network activity information	IP address, browsing history, search history, and information regarding your interaction with OPSWAT’s websites, online advertisements, products, and services.
H. Audio, electronic, visual, thermal, olfactory, or similar information	Security cameras, to the extent you visit one of our physical locations.
I. Professional or employment-related information	Your job title and place of employment.
K. Inferences drawn from other personal information	Preferences obtained from your interaction with OPSWAT’s websites, advertisements, products, and services.

We have not obtained any sensitive personal information from you within the past twelve (12) months.

2. Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you (e.g., when you communicate with us);
- Directly from our customers and their agents (e.g., when customers provide information about you through the use of OPSWAT’s products and services); and
- Through your use of OPSWAT’s websites, products, and services. For more information, please refer to OPSWAT’s Cookies Policy available at <https://www.opswat.com/legal>.

3. Purposes for Collecting Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To communicate with you;

- To give you access to OPSWAT’s websites, products, and services when you complete a registration form;
- To provide you with email alerts and other notices concerning OPSWAT’s products and services;
- To provide technical support to you, upon your request;
- To maintain our business relationship with you and/or the entity with which you affiliate;
- To maintain and improve OPSWAT’s websites, products, and services;
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others;
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA;
- To support internal administration with our affiliated entities;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred; and
- To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.

4. Sale or Share of Personal Information and the Right to Opt Out

When you visit our websites, use our products and/or services, open or click on emails we send to you, or interact with our advertisements, we or third parties we work with automatically collect certain information using technologies such as cookies, web beacons, clear GIF, pixels, internet tags, web server logs, and similar technologies (collectively, “data collection technologies”). Some data collection technologies help us maintain the security of our websites and your account, prevent crashes, fix bugs, save your preferences, and assist with basic site functions. We also permit third parties to use data collection technologies on our websites and our products and/or services for analytics and advertising, including to help manage and display advertisements and to tailor advertisements to your interests. The third parties use their technology to provide advertising about products and services tailored to your interests which may appear either on our websites or on other websites. For more information, please see OPSWAT’s Cookies Policy available at <https://www.opswat.com/legal>.

Our use of tracking technologies may be considered a “sale”/ “sharing” under California law. You can opt-out of being tracked by these technologies by broadcasting an opt-out preference signal, such as the Global Privacy Control (GPC) (on the browsers and/or browser extensions that support such a signal). The opt-out preference signal is a setting or extension on certain supported browsers that you can use to communicate to OPSWAT of your choice to opt out of the sale or sharing of your information. For more information on the browsers that support GPC, along with how to enable GPC, please visit <https://globalprivacycontrol.org/#download>. We will process your opt-out preference signals in a frictionless manner. If you broadcast such a signal, your request to opt-out of the sale and sharing will be linked to your browser identifier only. Please note that even after opting out, your use of our websites may still be tracked by us or our service providers. Alternatively, you may visit <https://go.opswat.com/myuserright> to submit a request to opt out of sale or sharing of your data.

We do not have actual knowledge that we sell or share the personal information of individuals under 16 years old.

Categories of personal information disclosed that may be considered “sale”/ “sharing” under California law: Basic Identifying Information, Device Information and Other Unique Identifiers, Internet or Other Network Activity, and Commercial Data.

Categories of third parties to whom personal information was disclosed that may be considered “sale”/ “sharing” under California law: advertisers and marketing partners, data analytics providers, and social media networks.

5. Our Disclosure of Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third parties as described below:

Category of Personal Information Disclosed	Category of Third Parties To Whom the Personal Information Was Disclosed	Business Purpose for Disclosing Your Personal Information
A. Identifiers	<ul style="list-style-type: none"> • Our affiliates; • Our third-party contractors and service providers; and • Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> • To communicate with you; • To give you access to OPSWAT’s websites, products, and services when you complete a registration form; • To provide you with email alerts and other notices concerning OPSWAT’s products and services; • To provide technical support to you, upon your request; • To maintain our business relationship with you and/or the entity with which you affiliate; • To maintain and improve OPSWAT’s websites, products, and services; • To support internal administration with our affiliated entities; and • To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
B. Personal information categories listed in the	<ul style="list-style-type: none"> • Our affiliates; 	<ul style="list-style-type: none"> • To communicate with you;

<p>California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<ul style="list-style-type: none"> • Our third-party contractors and service providers; and • Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> • To give you access to OPSWAT’s websites, products, and services when you complete a registration form; • To provide you with email alerts and other notices concerning OPSWAT’s products and services; • To provide technical support to you, upon your request; • To maintain our business relationship with you and/or the entity with which you affiliate; • To maintain and improve OPSWAT’s websites, products, and services; • To support internal administration with our affiliated entities; and • To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
<p>D. Commercial information</p>	<ul style="list-style-type: none"> • Our affiliates; • Our third-party contractors and service providers; and • Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> • To provide technical support to you, upon your request; • To maintain our business relationship with you and/or the entity with which you affiliate; • To maintain and improve OPSWAT’s websites, products, and services; • To support internal administration with our affiliated entities; and • To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
<p>F. Internet or other electronic network activity information</p>	<ul style="list-style-type: none"> • Our affiliates; • Our third-party contractors and service providers; and • Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> • To provide technical support to you, upon your request; • To maintain our business relationship with you and/or the entity with which you affiliate; • To maintain and improve OPSWAT’s websites, products, and services; • To support internal administration with our affiliated entities; and

		<ul style="list-style-type: none"> To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
H. Audio, electronic, visual, thermal, olfactory, or similar information	<ul style="list-style-type: none"> Our affiliates; Our third-party contractors and service providers; and Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> As necessary or appropriate to protect the rights, property or safety of us, our clients or others; To support internal administration with our affiliated entities; and To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
I. Professional or employment-related information	<ul style="list-style-type: none"> Our affiliates; Our third-party contractors and service providers; and Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> To assist in our communication with you; To give you access to OPSWAT’s websites, products, and services when you complete a registration form; To provide technical support to you, upon your request; To maintain our business relationship with you and/or the entity with which you affiliate; To maintain and improve OPSWAT’s websites, products, and services; To support internal administration with our affiliated entities; and To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.
K. Inferences drawn from other personal information	<ul style="list-style-type: none"> Our affiliates; Our third-party contractors and service providers; and Third parties to whom you or your agents authorize us to disclose your personal information. 	<ul style="list-style-type: none"> To maintain and improve OPSWAT’s websites, products, and services; To support internal administration with our affiliated entities; and To back up and/or archive for disaster recovery, business continuity, and record keeping purposes.

As noted above, we have not collected your sensitive personal information in the previous 12 months. As such, we do not use sensitive personal information for any business or commercial purposes.

6. Your Rights Under the CCPA

The CCPA provides you, as a California consumer, with specific rights regarding your personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources for the personal information we collected about you;
- Our business or commercial purpose for collecting, selling, or sharing personal information;
- The categories of third parties with whom we disclose personal information; and
- The specific pieces of personal information we collected about you.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

Right to Correct Information

You have the right to correct inaccurate personal information that we maintain about you.

Right to Avoid Discriminatory Treatment

You have the right not to receive discriminatory treatment by us for the exercise of privacy rights conferred by the CCPA, including your right not to be retaliated against for the exercise of their CCPA rights.

How to Exercise Your Rights

You may exercise your rights by:

- Submitting your request at <https://go.opswat.com/myuserright>; or

- Calling us at 1-855-OPSWAT1 (1-855-677-9281).

Only you or a person that you authorize to act on your behalf (an “Authorized Agent”) may make a verifiable consumer request related to your personal information. If your Authorized Agent submits a request on your behalf, pursuant to CCPA requirements, we will require the authorized agent to provide the agent’s contact information, information verifying the agent’s identity, and a signed letter of authorization from you that provides your agent with the authority to direct the handling of your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request.

7. Changes to this Notice

This Notice is effective as of the date stated at the start of this Notice. We reserve the right to modify this Notice at any time by posting the revised policy on this site and updating the date the statement was last revised at the start of this Notice, so please review it frequently. If we make material changes to this Notice, we will notify you by email or by means of a more prominent notice to you.

8. Contact Us

If you have any questions, please contact Legal at legal@opswat.com.