



SKC COMMUNICATION PRODUCTS, LLC PRIVACY POLICY

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INTRODUCTION

SKC Communication Products, LLC (“SKC,” “we,” “our,” or “us”) respects the privacy of your information. This Privacy Policy is designed to assist you in understanding how we collect, use and safeguard the information you provide to us in using our website, www.skccom.com (the “Site”), and browsing and shopping our online store, www.costore.com/SKCCOM/ (collectively, the “Site”), and the services provided through our Site (“Services”).

From time to time, we may change this Privacy Policy. If we do, we will post an amended version on this webpage. Please review this Privacy Policy periodically.

COLLECTING AND USING INFORMATION

Personally Identifiable Information We Collect Online

We may collect Personally Identifiable Information from you through your use of the Site and Services. “Personally Identifiable Information” is individually identifiable information about an individual consumer that we collect online and that we maintain in an accessible form. We collect the following types of Personally Identifiable Information:

Information You Provide

We may collect the following Personally Identifiable Information that you voluntarily provide to us:

- *Online Account.* If you register for an online account, we will collect your email address, password and security question. We will also collect any Personally Identifiable Information that you choose to provide to us, including first and last name and your company information. To login to your account, you will use your email address and password.
- *Make a Purchase.* If you make a purchase on our online store, we will collect your first and last name, email address, shipping address, telephone number, and the name of the company you work for. Through our third-party payment processor, we will collect your credit card number, expiration date and billing address.
- *Marketing Emails.* If you subscribe to receive SKC news and updates via email, we will collect your email address.



- *Register for Events and Training.* If you register for one of our webinars or other events, we, through our service provider, will collect your first and last name, email address, postal address, telephone number.
- *Contact Us.* If you complete our Contact Us form on the Site, we will collect your first and last name as well as your email address, postal address, and telephone number. We will also collect your company name and your job title. If you send us any feedback, questions, comments, or interact with us in any way, you may need to provide us with your first and last name and/or email address and we may collect any other Personally Identifiable Information that you choose to provide.
- *Careers.* If you apply to a job opening, we, through our job listings service provider, will collect your first and last name, email address, telephone number, and postal address. We will also collect employment history, educational information, demographic information, and any other Personally Identifiable Information that you choose to provide in your application materials.

Information as You Navigate Our Site

We automatically collect certain Personally Identifiable Information through your use of the Site and Services, such as the following:

- *Usage Information.* We collect information such as which of the pages on the Site you access, the frequency of access, and what you click on while on the Site.
- *Device Information.* We collect information about the device you are using, such as hardware model, operating system, application version number, and browser.
- *Mobile Device Information.* In addition to the Device Information listed above, when you access our Site via a browser on your mobile device, we collect and aggregate information about whether you are accessing the Site via a mobile device or tablet, device type, and carrier.

Third Party Information

In some cases, we may receive certain Personally Identifiable Information from you about a third party. For example, when contacting us, you may provide the name and email address of a third party. If you submit any Personally Identifiable Information about another individual to us, you are responsible for making sure that you have the authority to do so and to allow us to use their Personally Identifiable Information in accordance with this Privacy Policy.



How We Use Your Personally Identifiable Information

We use the Personally Identifiable Information we collect to provide the Services to you, to improve our Services and Site, and to protect our legal rights. In addition, we may use the Personally Identifiable Information we collect to:

- Process your account registration;
- Process and fulfill your order;
- Review your job application;
- Contact you regarding our products and services that we feel may be of interest to you;
- Communicate with you about our Site or Services or to inform you of any changes to our Site or Services;
- Provide support;
- Maintain and improve our Site and Services;
- Defend our legal rights and the rights of others;
- Efficiently maintain our business; and
- Comply with applicable law.

How We Share Your Personally Identifiable Information

We may share the information that we collect about you in the following ways:

- With service providers who perform data or Site-related services on our behalf (e.g., email, hosting, maintenance, payment processors, backup, analysis, etc.);
- With the supplier or manufacturer of the products you purchase to register warranty and maintenance services and so you can be informed of any product updates or problems, as applicable;
- To service providers to prepare, deploy and analyze advertising content;
- To the extent that we are required to do so by law;
- In connection with any legal proceedings or prospective legal proceedings;



- To establish, exercise, or defend our legal rights, including providing information to others for the purposes of fraud prevention;
- To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that Personally Identifiable Information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that Personally Identifiable Information;
- To any other person or entity as part of any business or asset sale; and
- To any other person or entity where you consent to the disclosure.

COOKIES AND OTHER TRACKING TECHNOLOGIES

How We Use Cookies

Like many other companies, we use cookies and other tracking technologies (such as pixels and web beacons) (collectively, “Cookies”). “Cookies” are small files of information that are stored by your web browser software on your computer hard drive, mobile or other devices (e.g., smartphones or tablets).

We may use Cookies to:

- Estimate audience size and usage patterns;
- Compile aggregate data about site traffic and site interactions to resolve issues and offer better site experiences and tools in the future; and
- Recognize when you return to the Site.

How You Can Opt-Out of Cookies

Browser Settings

Cookies can be blocked by changing your Internet browser settings to refuse all or some Cookies. If you choose to block all Cookies (including essential Cookies) you may not be able to access all or parts of the Site.

You can find out more about Cookies and how to manage them by visiting www.AboutCookies.org.

Advertising Industry Resources



While the Site does not utilize third-party advertiser cookies, you can understand which entities have currently enabled Cookies for your browser or mobile device and how to opt-out of some of those Cookies by accessing the [Network Advertising Initiative's website](#) or the [Digital Advertising Alliance's website](#). For more information on mobile specific opt-out choices, visit the [Network Advertising Initiative's Mobile Choices website](#).

Please note that these opt-out mechanisms are specific to the device or browser on which they are exercised. Therefore, you will need to opt out on every browser and device that you use.

“DO NOT TRACK” SIGNALS

Some internet browsers incorporate a “Do Not Track” feature that signals to websites you visit that you do not want to have your online activity tracked. Given that there is not a uniform way that browsers communicate the “Do Not Track” signal, the Site does not currently interpret, respond to or alter its practices when it receives “Do Not Track” signals.

CHOICES ABOUT YOUR PERSONALLY IDENTIFIABLE INFORMATION

Review and Request Changes to Your Personally Identifiable Information

To review or request changes to any of your Personally Identifiable Information, please contact us at security@skccom.com.

Marketing Communications

To unsubscribe from our marketing emails, please click the unsubscribe link included in the footer of our emails. You also may submit a request to us at security@skccom.com.

SECURITY

We maintain commercially reasonable security measures to protect the Personally Identifiable Information we collect and store from loss, misuse, destruction, or unauthorized access. However, no security measure or modality of data transmission over the Internet is 100% secure. Although we strive to use commercially acceptable means to protect your Personally Identifiable Information, we cannot guarantee absolute security.

THIRD PARTY LINKS

The Site may contain links that will let you leave the Site and access another website. Linked websites are not under our control. Except as stated below, this Privacy Policy



applies solely to Personally Identifiable Information that is acquired by us on this Site. We accept no responsibility or liability for these other websites.

CHILDREN’S PRIVACY

The Site and Services are not intended for children under 13 years of age. We do not knowingly collect, use, or disclose personal information from children under 13.

NOTICE TO RESIDENTS OF EUROPE AND THE UNITED KINGDOM

Legal Bases for Processing Your Personal Information

Through your use of the Site and Services, we may collect personal data from you. For purposes of this section, “Personal Data” refers to any information relating to an identified or identifiable natural person that we maintain in an accessible form. Personal Data is the equivalent of Personally Identifiable Information discussed in the foregoing sections of this Privacy Policy.

If you are in a country in the European Union or in the United Kingdom, you are entitled to an explanation of the legal bases we rely on to process your Personal Data. The legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it, which is discussed below.

Consent

We may process your Personal Data based on your consent such as when you ask us to send you certain kinds of marketing communications. You have the right to withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal.

Our Legitimate Interests

We may process your Personal Data if doing so is necessary for our legitimate interests and your rights as an individual do not override those legitimate interests. For example, we process your Personal Data to carry out fraud prevention activities and activities to increase network and information security, identify usage trends, determine the effectiveness of promotional campaigns, expand our business activities and improve our services and the content and functionality of our Site. In certain circumstances, we rely upon our legitimate business interest to send marketing emails to customers who have previously requested being on our mailing list as these recipients have the ability to unsubscribe from receiving these emails as described below.

To Perform a Contract



We may process your Personal Data to administer and fulfill contractual obligations to you.

To Enable Us to Comply with a Legal Obligation

We may process your Personal Data to comply with legal obligations to which we are subject. This may include any requirement to produce audited accounts, any legal obligation to share information with law enforcement agencies, public or governmental authorities, and to comply with legal processes.

Necessary for the Exercise or Defense of Legal Claims

If you bring a claim against us or we bring a claim against you, we may process your Personal Data in relation to that claim.

SKC is the Data Controller of all Personal Data collected from residents of the European Union or the United Kingdom. If you have any questions about or need further information concerning the legal basis on which we collect and use your Personal Data for any specific processing activity, please contact us using the “**HOW TO CONTACT US**” section below.

Your Rights

Under the GDPR and the pending U.K. equivalent, you have the following rights related to SKC’s use of your Personal Data.

Number	Description of your right
Right 1	A right to access personal data held by us about you, as well as information about how we are using your data.
Right 2	A right to require us to rectify any inaccurate personal data held by us about you.
Right 3	A right to require us to erase personal data held by us about you, and where the personal data has been made public, for other controllers processing the personal data to also erase links to, or copy or replication of, such personal data. This right will only apply where (for example): we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).
Right 4	A right to restrict our processing of personal data held by us about you. This right will only apply where (for example): you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal data to achieve the purpose we collected it for, but you require the data for the purposes of dealing with legal claims.
Right 5	A right to receive personal data, which you have provided to us, in a structured, commonly used and machine-readable format. You also have the right to require us to transfer this personal data to another organization, at your request.



Right 6	A right to object to our processing of personal data held by us about you (including for the purposes of sending marketing materials to you).
Right 7	A right to withdraw your consent, where we are relying on it to use your personal data (for example, to provide you with marketing information about our services or products). You can also: click "unsubscribe" on any of our emails, and we will ensure we don't send you any communications of this nature in future.

To exercise any of your rights above, please contact SKC at security@skccom.com. If you choose to exercise any of your rights listed above, it may affect your ability to use the Site, as the operation and functionalities provided on the Site may require the use of your Personal Data.

Making a Complaint

If you have any concerns or complaints regarding our processing of your Personal Data, please contact us as described in the “**HOW TO CONTACT US**” section below and we will do our best to answer any question and resolve any complaint to your satisfaction.

If, for whatever reason, you feel we do not meet the standards you expect of us, you are also entitled to make a complaint to your local supervisory authority:

- [EU Data Protection Authorities \(DPAs\)](#)
- [Swiss Federal Data Protection and Information Commissioner \(FDPIC\)](#)

How Long Is Your Personal Data Kept?

We will retain your Personal Data for as long as necessary to fulfill the purposes for which we collect it and as set out in this Privacy Policy and for the purpose of satisfying any legal, accounting, or reporting requirements that apply to us.

NOTICE TO NEVADA RESIDENTS

Nevada law allows Nevada residents to opt-out of the sale of certain types of personal information. Subject to several exceptions, Nevada law defines “sale” to mean the exchange of certain types of personal information for monetary consideration to a person for the person to license or sell the information to additional persons. We do not currently sell personal information as defined in the Nevada law. However, if you are a Nevada resident, you still may submit a verified request to opt-out of sales and we will record your instructions and incorporate them in the future if our policy changes. Opt-out requests may be sent to security@skccom.com.

NOTICE TO CALIFORNIA RESIDENTS



The California Consumer Privacy Act (CCPA) requires that we provide California residents with a privacy policy that contains a comprehensive description of our online and offline practices regarding the collection, use, disclosure, and sale of personal information and of the rights of California residents regarding their personal information. This section of the Privacy Policy is intended solely for, and is applicable only as to, California residents. If you are not a California resident, this section does not apply to you and you should not rely on it.

The CCPA defines “personal information” to mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. Personal information does not include publicly available, deidentified or aggregated information. For purposes of this “**Notice to California Residents**” section we will refer to this information as “Personal Information.”

The CCPA contains an exception that is relevant to us. Some of the CCPA’s privacy rights explained below do not apply to personal information collected in a business-to-business context. That is information reflecting a written or verbal communication or a transaction between us and a consumer, where the consumer is acting as an employee, owner, director, officer, or contractor of another entity and when the communication or transaction occur solely within the context of us conducting due diligence regarding, or providing or receiving a product or service to or from such entity.

Right to Know About Personal Information Collected, Disclosed, or Sold

If you are a California resident, you have the right to request that we disclose what Personal Information we have collected about you in the 12-month period preceding your request. This right includes the right to request any or all of the following:

- (1) Specific pieces of Personal Information that we have collected about you;
- (2) Categories of Personal Information that we have collected about you;
- (3) Categories of sources from which the Personal Information was collected;
- (4) Categories of Personal Information that we sold (if applicable) or disclosed for a business purpose about you;
- (5) Categories of third parties to whom the Personal Information was sold (if applicable) or disclosed for a business purpose; and
- (6) The business or commercial purpose for collecting or, if applicable, selling Personal Information.



The CCPA defines “sell” to mean selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a California resident’s Personal Information to another business or a third party for monetary or other valuable consideration.

Collection of Personal Information

We currently collect and, in the 12 months prior to the Last Updated date of this Privacy Policy, have collected the following categories of Personal Information about California residents directly from them in their capacity as a customer or prospective customer and, in certain cases, from our operating systems and platforms, the online store, and online resellers:

- Name
- Alias
- Postal address
- Unique personal identifiers (device identifier; customer number, unique pseudonym or user alias; telephone numbers, or other forms of persistent or probabilistic identifiers that can be used to identify a particular consumer or device)
- Internet Protocol address
- Email address
- Account name
- Telephone number
- Signature
- Bank account number
- Credit and debit card number
- Commercial information (products or services purchased, obtained or considered)

In addition to the purposes stated above in the section “COLLECTING AND USING INFORMATION,” we collected the above Personal Information for the following business or commercial purposes:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services on behalf of the business or service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of the business or service provider
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by the



business, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by the business

- Advancing a person’s commercial or economic interests, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction

Disclosure of Personal Information

The following table identifies the categories of Personal Information that we disclosed for a business purpose in the 12 months preceding the Last Updated date of this Privacy Policy and, for each category, the category of third parties to whom the Personal Information was disclosed. We did not sell Personal Information to third parties in the 12 months preceding the Last Updated date of this Privacy Policy.

Category of Personal Information	Category of Third Parties to Whom Information was Disclosed
Identifiers (name, postal address, and telephone number)	Business partner, law enforcement/legal requests, operating system and platform, service provider (e.g., maintenance, analysis, audit, payments, fraud detection)
Unique personal identifiers, email address, and signature	Business partner, law enforcement/legal requests
Account name	Business partner, law enforcement/legal requests, operating system and platform
Bank account number	Business partner, law enforcement/legal requests, operating system and platform, service provider (e.g., maintenance, analysis, audit, payments, fraud detection)
Credit and debit card number	Service provider (e.g., maintenance, analysis, audit, payments, fraud detection)
Commercial information (products or services purchased, obtained or considered)	Business partner



We do not knowingly collect or sell the Personal Information of minors under 16 years of age.

Right to Request Deletion of Personal Information

If you are a California resident, you have the right to request that we delete the Personal Information about you that we have collected. However, per the CCPA, we are not required to comply with a request to delete if it is necessary for us to maintain the Personal Information in order to, for example, complete a transaction, detect security incidents, comply with a legal obligation, or otherwise use the Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.

How to Submit a Request to Know or Delete

You may submit a request to know or delete through our interactive webform available at <https://www.skccom.com/california-consumer-privacy-act-request-form/> or by calling us at 1-800-882-7779, Option 3.

Our Process for Verifying a Request to Know or Delete

If we determine that your request is subject to an exemption or exception, we will notify you of our determination. If we determine that your request is not subject to an exemption or exception, we will comply with your request upon verification of your identity and, to the extent applicable, the identity of the California resident on whose behalf you are making such request

We will verify your identity either to a “reasonable degree of certainty” or a “reasonably high degree of certainty” depending on the sensitivity of the Personal Information and the risk of harm to you by unauthorized disclosure or deletion as applicable.

For requests to access categories of Personal Information and for requests to delete Personal Information that is not sensitive and does not pose a risk of harm by unauthorized deletion, we will verify your identity to a “reasonable degree of certainty” by verifying at least two data points that you previously provided to us and which we have determined to be reliable for the purpose of verifying identities.

For requests to access specific pieces of Personal Information or for requests to delete Personal Information that is sensitive and poses a risk of harm by unauthorized deletion, we will verify your identity to a “reasonably high degree of certainty” by verifying at least three pieces of Personal Information previously provided to us and which we have determined to be reliable for the purpose of verifying identities. In addition, you will be required to submit a signed declaration under penalty of perjury stating that you are the individual whose Personal Information is being requested.



Right to Opt-Out of Sale of Personal Information

If you are a California resident, you have the right to direct us to stop selling your Personal Information.

We do not sell Personal Information as it is defined in the CCPA.

Right to Non-Discrimination for the Exercise of a California Resident’s Privacy Rights

We will not discriminate against California residents if they exercise any of the rights provided in the CCPA as described in this section “**Notice to California Residents.**” As such, we will not deny goods or services to that California resident; charge different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; provide a different level or quality of goods or services to the California resident; or suggest that the California resident will receive a different price or rate for goods or services or a different level or quality of goods or services. However, we are permitted to charge a California resident a different price or rate, or provide a different level or quality of goods or services, if that difference is reasonably related to the value provided to us by the individual’s data.

Authorized Agents

If you are submitting a request on behalf of a California resident, please submit the request through one of the designated methods discussed above. After submitting the request, we will require additional information to verify your authority to act on behalf of the California resident.

Shine the Light Law

We do not disclose personal information obtained through our Site or Services to third-parties for their direct marketing purposes. Accordingly, we have no obligations under California Civil Code § 1798.83.

ACCESSIBILITY

We are committed to ensuring this Privacy Policy is accessible to individuals with disabilities. If you wish to access this Privacy Policy in an alternative format, please contact us as described below.



HOW TO CONTACT US

To contact us for questions or concerns about our privacy policies or practices please e-mail us at security@skccom.com.