



# Privacy Statement

Cassia Networks Inc. and its subsidiary, Beijing Cassia Networks Technology Co., Ltd. ("CASSIA"), respect your privacy. This Privacy Statement informs you about our privacy practices including details of the personal data we collect, use, disclose and transfer as well as choices you can make and rights you can exercise in relation to your personal data. This Privacy Statement is available from a link on the footer of every CASSIA web page.

CASSIA respects and takes into account the major privacy principles and frameworks around the world.

This Privacy Statement applies to all CASSIA-owned websites, domains, services, applications, and products, and those of our subsidiaries, except that a privacy policy or statement specific to a particular CASSIA program, product or service may supersede or be supplemented by this Privacy Statement.

## 1. How we use personal data

We collect personal data only if required to provide our products or services, fulfil our legitimate business purposes and/or comply with applicable laws and regulations. Depending on your relationship with CASSIA we collect and process your personal data as follows:

- CASSIA products and services: contact details and login credentials for the following main purposes: entering into and performing agreements with you or your organization; providing support and tools to activate licenses and request support; managing and fulfilling orders; deploying and delivering products and services; conducting quality controls; managing returns of defective media; operating and providing access to customer portals and hosted management services; consulting; developing and improving our products and services and ensuring compliance with regulatory requirements.
- CASSIA Financial Services: contact details, records of good standing and other information as may be relevant (e.g. information from publicly available resources) for the following main purposes: providing lease, loan and other financial services; conducting anti-money laundering and other regulatory checks; initiating credit approval process and facilitating the purchase and resale of equipment.
- Sales and marketing: contact details, identification information, information required to purchase our products and services online, profile, role and preferences, login credentials, digital activity information and other information as may be relevant (e.g. information from publicly available sources) for the following main purposes: sales and marketing; advertising; creating and delivering targeted adverts and offers; conducting marketing campaigns; managing contacts and preferences; generating leads and opportunities; organizing and managing events; and engaging in social media interactions.
- Online Data Collection Tools: digital activity information for the following main purposes: enabling efficient use of our websites, products and services; collecting statistics to optimize the functionality of our websites, products and services; improving user experience and delivering content tailored to their interests; and improving marketing and advertising campaigns.

- Online forums and surveys: contact details, login credentials, comments and feedback for the following main purposes: engaging with partners and suppliers in online forums; conducting customer satisfaction and engagement surveys.
- Partner and supplier programs: contact details for the following main purposes: managing relations with partners and suppliers; engaging and delivering products and services to customers in which case we may receive personal data directly from you or from our partners.
- Training and education: contact details for the main purpose of conducting trainings and education programs for customers, partners and suppliers.
- Due diligence screening: contact details and other information as may be relevant (e.g. information from publicly available sources) for the following main purposes: conducting anti-corruption due diligence on third parties and conducting required investigations, in compliance with applicable laws.
- Brand-protection programs: contact details, login credentials and other relevant information (e.g. information from publicly available sources) for the main purpose of conducting investigations into CASSIA product-related fraud, compliance, theft and/or counterfeit.
- Security and authentication: contact details and identification information for the following main purposes: ensuring safety and security of CASSIA staff and premises; login credentials, protecting CASSIA's network and other digital assets; providing access to restricted areas and information assets and protecting personal data from unauthorized access.
- Whistleblowing: contact details and information about alleged misconducts for the main purpose of detecting, preventing and investigating misconduct by CASSIA staff, customers, partners and suppliers.
- Inquiries and complaints: contact details and information included in inquires and complaints for the main purpose of entering into and performing agreements with you or your organization; providing support and tools to activate licenses and request support; managing and fulfilling orders; deploying and delivering products and services; conducting quality controls; managing returns of defective media; operating and providing access to customer portals and hosted management services; consulting; developing and improving our products and services and ensuring compliance with regulatory requirements.

Non-CASSIA web sites and social media features. CASSIA sites or services may provide links to third-party applications, products, services or websites for your convenience or information. We may also provide social media features that enable you to share information with your social networks and to interact with CASSIA on various social media sites. CASSIA does not control third party sites, or their privacy practices and we do not endorse or make any representations about third party sites. The personal data you choose to provide to or that is collected or shared by these third parties is not covered by this Privacy Statement. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your personal data.

## 2. How we share personal data

CASSIA does not sell, rent or lease personal data to others except as described in this Privacy Statement. We may share and/or disclose your personal data as follows:

Disclosure within the CASSIA organization. CASSIA has its headquarters in the United States of America and operates worldwide. CASSIA may disclose your personal data as necessary within the CASSIA organization in connection with how we use your personal data.

Disclosure to third parties. CASSIA retains suppliers and service providers to manage or support its business operations, provide professional services, deliver products, services and customer solutions and to assist CASSIA with marketing and sales communication initiatives. Those third parties may receive and process your personal data under appropriate instructions, as necessary to support and facilitate how we use your personal data. Suppliers and service providers are required by contract to keep confidential and

secure the information they process on behalf of CASSIA and may not use it for any purpose other than to carry out the services they are performing for CASSIA.

Where CASSIA engages with partners, resellers and/or distributors as part of its business operations, CASSIA may disclose your personal data to them in order to facilitate sales and delivery of its products and services. Partners, resellers and/or distributors are required by contract to keep confidential and secure the information received from CASSIA and may use it only for the said purposes, unless otherwise authorized by you or applicable laws and regulations.

Except as described in this Privacy Statement, CASSIA will not share your personal data with third parties without your permission, unless to: (i) respond to duly authorized information requests of police and governmental authorities; (ii) comply with law, regulation, subpoena, or court order; (iii) enforce/protect the rights and properties of CASSIA or its subsidiaries; or (iv) protect the rights or personal safety of CASSIA, our employees, and third parties on or using CASSIA property when allowed and in each case in accordance with applicable law.

Circumstances may arise where, whether for strategic or other business reasons, CASSIA decides to sell, buy, merge or otherwise reorganize businesses in some countries. Such a transaction may involve the disclosure of personal data to prospective or actual purchasers, or the receipt of it from sellers. It is CASSIA's practice to seek appropriate contractual protection for personal data in these types of transactions.

### **3. How we transfer personal data internationally**

CASSIA may transfer your personal data as necessary within the CASSIA organization and to other third parties. The recipients may be located in countries which do not provide the same level of data protection as the country in which you are located. CASSIA will take steps to ensure personal data we transfer is adequately protected as required by applicable data protection laws. Where required by local law, we will request your consent to transfer your personal data.

If you would like to receive more information about the appropriate safeguards and/or receive a copy of the relevant mechanism for your review, please contact CASSIA at the address provided in number 10 below.

### **4. How to manage communications and preferences**

CASSIA may provide you with information that complements our products and services and/or communications about our new products, services and offers. If you or your organization purchased our products or services, you may receive alerts, software updates or responses to support requests that are part of our products and services. If you choose to receive CASSIA communications, you may also choose to subscribe to receive specific newsletters and publications. In some cases, you may also choose whether to receive the information and communication by email, telephone, or post.

Manage communication choices. You can change your choices and preferences relating to CASSIA communications by:

- Sending an email with your communication choice preference to your sales and/or support contact, or to Cassia Networks Customer Care dept. at [support@cassianetworks.com](mailto:support@cassianetworks.com)

Unsubscribe from communications. In the event you no longer wish to receive CASSIA communications, you can unsubscribe from such communications by:

- Following opt-out or unsubscribe link and/or instructions included in each marketing email communication;
- Contacting Cassia Customer Care via email at [support@cassianetworks.com](mailto:support@cassianetworks.com), place the word "Unsubscribe" in the message header, and provide your email address where you don't want to receive future email communications;

In the event your opt-out or unsubscribe request has not been resolved in a timely manner, please contact CASSIA's VP of U.S. Operations at: [vanakrueger@cassianetworks.com](mailto:vanakrueger@cassianetworks.com) with details of your name, contact information, and description of the communications you no longer wish to receive from CASSIA.

Please note that these options do not apply to communications relating to the administration of orders, contracts, support, product safety warnings, or other administrative and transactional notices, where the primary purpose of these communications is not promotional in nature.

## 5. Automatic Data Collection Tools

How CASSIA uses Automatic Data Collection Tools. CASSIA web sites use cookies, web beacons and other similar technologies (collectively, Automatic Data Collection Tools), to remember log-in details, collect statistics to optimize site functionality, improve your user experience and deliver content tailored to your interests.

Cookies may also be used when you share information using a social media sharing button on our websites. The social network will record that you have done this and may use this information to send you targeted advertisements. The types of cookies used by these companies and how they use the information is governed by their privacy policies.

When you enter your contact details on a web form on an Cassia.com site, in order to subscribe to a service, download a white paper or request information about CASSIA's products and service, your contact details may be stored in a cookie on your device. This information is then accessed on subsequent visits to Cassia.com sites, allowing us to track and record the sites you have visited and the links you have clicked, in order to better personalize your on-line experience, and future CASSIA communications.

If you choose to receive marketing emails or newsletters from CASSIA, we may track whether you've opened those messages and whether you've clicked on links contained within those messages, through the use of web beacons and personalized URLs embedded in these communications. This allows CASSIA to better personalize future communications and limit these communications to subjects that are of interest to you.

Choices Regarding Automatic Data Collection & Online Tracking. While CASSIA web sites at this time do not recognize automated browser signals regarding tracking mechanisms, such as "do not track" instructions, you can generally express your privacy preferences regarding the use of most cookies and similar technologies through your web browser. You can set your browser in most instances to notify you before you receive a cookie, giving you the chance to decide whether to accept it or not. You can also generally set your browser to turn off cookies. Note: Cookies can be turned back on anytime, at the user's preference.

Since cookies allow you to take advantage of some of our web sites' features, we recommend that you leave them turned on. If you block, turn off or otherwise reject our cookies, some web pages may not display properly, or you will not be able, for instance, to add items to your shopping cart, proceed to checkout, or use any web site services that require you to sign in.

Some of our websites use Google Analytics cookies. Information collected by Google Analytics cookies will be transmitted to and stored by Google on servers in the United States of America in accordance with its privacy practices. To see an overview of privacy at Google and how this applies to Google Analytics, visit <https://www.google.com/policies/privacy/>. You may opt out of tracking by Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout>.

## **6. How to access, update or delete personal data**

CASSIA strives to keep your personal data accurately recorded. We have implemented technology, management processes and policies to help maintain data accuracy. In accordance with applicable laws, CASSIA provides individuals with reasonable access to personal data that they provide to CASSIA and the reasonable ability to review and correct it.

To protect your privacy and security, we will take reasonable steps to verify your identity, such as the requirement to provide a copy of a user ID, before granting access to your personal data. To view and update the personal data you provided directly to CASSIA, you can return to the web page where you originally submitted your data and follow the instructions on that web page or contact the CASSIA Privacy Office at [support@cassianetworks.com](mailto:support@cassianetworks.com).

## **7. How we keep personal data secure**

CASSIA takes seriously the trust you place in us to protect your personal data. In order to protect your personal data from loss, or unauthorized use, access or disclosure, CASSIA utilizes reasonable and appropriate physical, technical, and administrative procedures to safeguard the information we collect and process. All systems used to support CASSIA's business are governed by CASSIA's corporate Cyber Security policies, which are built upon industry standards and best practices like the International Organization for Standardization (ISO) 27001 family of standards and National Institute of Standards and Technology (NIST) standards.

When collecting or transferring sensitive information we use a variety of additional security technologies and procedures to help protect your personal data from unauthorized access, use, or disclosure. The personal data you provide us is stored on computer systems locked in controlled facilities which have limited access. Access to your information is restricted to CASSIA employees or authorized third parties who need to know that information in order to process it for us, and who are subject to strict confidentiality obligations. When we transmit sensitive information over the internet, we protect it through the use of encryption, such as the Transport Layer Security (TLS), Datagram Transport Layer Security (DTLS), or Secure Socket Layer (SSL).

## **8. How long we keep personal data**

Typically, we keep personal data for the length of any contractual relationship and, to the extent permitted by applicable laws, after the end of that relationship for as long as necessary to perform purposes set out in this Privacy Statement, to protect CASSIA from legal claims and administer our business. When we no longer need to use personal data, we will delete it from our systems and records or take steps to anonymize the data unless we need to keep it longer to comply with a legal or regulatory obligation. If you would like to receive more information about our data retention policies, please contact the CASSIA Privacy Office at [support@cassianetworks.com](mailto:support@cassianetworks.com).

## 9. Additional information for individuals in the EU, EEA and Switzerland

Our privacy practices are aligned with the requirements of the General Data Protection Regulation (GDPR). If you are located in the European Union (EU), the European Economic Area (EEA) or Switzerland, this additional information may be relevant and applicable to you.

Data Protection Officer. CASSIA has appointed a Data Protection Officer (DPO) to comply with the GDPR. You can contact the DPO by send an email attention DPO to [support@cassianetworks.com](mailto:support@cassianetworks.com) or by mail at:

Cassia Networks Inc.  
Attn: Privacy Office  
97 E. Brokaw Road, Suite 130  
San Jose, CA 95112, USA

Legal basis to process personal data. We process your personal data on the following legal bases:

- Legitimate Interest. We may process your personal data as required to pursue our legitimate business interests (provided this is not overridden by interests or rights of relevant individuals). In particular, to manage, develop and improve our products and services; support our customers and sales operations; protect our staff and assets; communicate information that supplements our products and services and ensure compliance with laws and regulations.
- Performance of an agreement. We may process your personal data to enter into or fulfil agreements with your or your organizations, including to deliver and manage our products and services and allow our customers to use our products, services and supporting tools.
- Legal obligation. We may process your personal data to comply with applicable laws and regulations, establish or exercise our legal rights. For example, in connection with legal claims, compliance, regulatory and investigative purposes.
- Consent. We may process your personal data where you have provided your consent. In particular, where we cannot rely on an alternative legal basis or we are required by law to ask for your consent in the context of some of our sales and marketing activities, online data collection tools, or surveys. At any time, you have a right to withdraw your consent by changing your communication choices, unsubscribing from CASSIA communications or contacting the CASSIA Privacy Office at [support@cassianetworks.com](mailto:support@cassianetworks.com).

Your rights in relation to your personal data. You may have the following rights to:

- Request access or copies of personal data CASSIA processes about you;
- Rectify your personal data, if inaccurate or incomplete;
- Delete your personal data, unless an exception applies. For instance, we may need to keep your personal data to comply with legal obligation;
- Restrict the processing of your personal data, in certain circumstances. For instance, if you contest accuracy of your personal data you may request that we restrict processing of your personal data for the time enabling us to verify the accuracy of your personal data;
- Data portability, in certain circumstances. For instance, you may request us to transmit some of your personal data to another organization if the processing is based on your consent or a contract;
- Object to processing of your personal data, in certain circumstances. For instance, you may object to direct marketing including use of your personal data for profiling for direct marketing or where we process your personal data because we have legitimate interest in doing so.

These rights may be limited in some situations such as where CASSIA can demonstrate that CASSIA has a legal requirement or legitimate interest to process your personal data.

If you would like to exercise your rights, please contact us by writing to the DPO at the address indicated in the Data Protection Officer section above.

Complaint with a supervisory authority. If you consider that the processing of your personal data infringes the GDPR, you have a right to lodge a complaint with a supervisory authority in the country where you live, or work, or where you consider that data protection rules have been breached.

Your rights. You may have additional rights where you believe your personal data has been transferred to a CASSIA organization located outside the EU and processed by that organization. You may have a right to:

- Lodge a complaint with the EU CASSIA organization which transferred your personal data outside the EU;
- Lodge a complaint with a supervisory authority located in the same country as the EU CASSIA organization which transferred your data outside the EU;
- Bring a court action against the EU CASSIA organization which transferred your personal data outside the EU

If CASSIA processes your personal data on behalf of a CASSIA customer, then we will, in the first instance, refer your complaint to our customer to handle.

## 10. How to contact us

We value your opinions. If you have any questions about our Privacy Statement, any concerns or complaint regarding our collection and use of your personal data or wish to report a possible breach of your privacy, please contact the CASSIA Privacy Office by email at [support@cassianetworks.com](mailto:support@cassianetworks.com) (attn: DPO) or write to us at the appropriate address below. We will treat your requests and complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to address your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

### ***Canada, Latin America, US, Europe, Middle East, Africa, Asia Pacific (not including China), Japan:***

Cassia Networks Inc.  
Attn: Privacy Office  
97 E. Brokaw Road, Suite 130  
San Jose, CA 95112, USA

### ***China***

Beijing Cassia Networks Technology Co., Ltd.  
Attn: Privacy Office  
Beijing Zhongguan Development Building  
Room 303, Building A, 3/F  
No.12, Xinxu Road, Haidian  
Beijing 100085 China

## **11. Changes to this Privacy Statement**

If we modify this Privacy Statement, we will post a revised version with an updated revision date at the privacy link on the footer of every CASSIA web page: <https://www.cassianetworks.com/privacy-policy>