

DZS Privacy Policy

Dated February 12, 2019

DASAN Zhone Solutions respects and is committed to protecting the privacy of individuals who provide us with personal information, including personal information provided or made available by visitors to our website, www.dzsi.com, and related sub-sites under this domain including www.dasanzhone.com, as well as other websites we operate and that include a direct link to this privacy policy (our “Websites”).

Your use of the Website and/or any content or features available on the Website constitutes your acceptance of the terms of this Privacy Policy and your consent to our collection, use, disclosure and/or storage of your information, including Personal Information, as stated in this Privacy Policy.

This privacy policy (“Policy”) describes our personal information handling practices in connection with our Websites and applies to DASAN Zhone Solutions, Inc. (DZS), 7195 Oakport Street, Oakland, California 94621 USA and other companies in DASAN Zhone Solutions, Inc.’s group (collectively, “DZS”) as data controller.

Information Collected

Personal information means any information relating to an identified or identifiable individual. If we link other data with your personal information, we will treat that linked data as personal information.

DZS collects the following categories of personal information:

- First and last name
- Email address
- Postal or physical address or other contact information
- IP addresses or other access log information
- Browser and device information
- App or device usage data
- Aggregated, anonymized, or de-identified information
- Demographic information and other similar information provided by you (e.g., language, occupation)
- Certain other information needed to answer a request; provide information and services; or comply with various national, state, provincial, or local governmental reporting requirements.

In addition, when accessing certain documents or services on our Websites, visitors may be asked to provide certain information, such as how they can be contacted, where they work, and what they do.

To the extent permitted by applicable law, we and the third parties we engage may combine the information we collect from you over time and across our Websites with information obtained

from other sources, including third-party verification service providers. This practice helps us improve the overall accuracy and completeness of the information, and better tailor our interactions with you.

Purposes of Processing Personal Information

We collect and process personal information when necessary to fulfill purposes that are in our legitimate interests and/or when requested by you. These purposes include:

- Operating and maintaining our Websites including opportunities to analyze and improve our products, services and Website content
- Responding to an inquiry
- Creating an account and verifying your identity
- Processing your order
- Registering products
- Enabling the use of certain features of our products
- Provide you with subscription services to web-based applications as specified in the applicable terms of service for such applications
- Providing technical support
- Personalizing your experience
- Viewing product demonstrations and software trials
- Accessing white papers, eBooks, and other marketing collateral
- Tailoring the display of products and services on the Website based on your Website usage
- Sending you information we think you may find useful, including information about our products and services
- Participating in marketing promotions
- Participating in seminars, training courses, or in-person or online events
- Conducting user surveys
- Requesting information on how to purchase DZS products
- Performing market research on an aggregated basis, including as to the effectiveness of our advertising and marketing
- Exploring career opportunities
- Meeting the needs of visitors to our Websites by answering questions or improving delivery of information and services
- Other legitimate purposes permitted by applicable law

Marketing Information

From time to time and in compliance with applicable law requirements (e.g. based on your prior consent if required under the law applicable to you), we use contact information that you have provided to send you tailored information regarding our products and services, as well as other information we think may be useful to you.

You can provide your preferences and interests, as well as update them if you've previously registered, on our preferences page located at <https://info.dasanzhone.com/register>. If you do not wish to receive any marketing information from us, you may opt out by clicking the "Unsubscribe" link on any of our emails, or alternatively, request opt-out request by sending an email to info@dasanzhone.com.

Sharing and Disclosure of Personal Information

The personal information we collect will be used solely by and transferred only to DZS with its global offices and subsidiaries. You may send a request to info@dasanzhone.com to inquire about your personal information.

Additionally, an individual's personal information is not shared outside DZS, except under conditions explained below and always in accordance with applicable law:

- When we have an individual's consent to share the information
- If sharing an individual's information is necessary to provide a product or service that is requested
- As part of a joint sales promotion or to pass sales leads to one of our distribution partners
- In an aggregated and/or anonymized form that cannot reasonably be used to identify you
- In response to a request for information by a competent authority if we believe disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process, including to meet national security or law enforcement requirements
- In connection with, or during the negotiation of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or to another company
- For legitimate purposes permitted by applicable law

Security of Personal Information

DZS is committed to maintaining the security of your Personal Information and take what we believe are reasonable and industry-recognized safeguards designed to protect against accidental, unlawful or unauthorized access, disclosure or use. Nevertheless, transmissions over the Internet are never entirely secure and we cannot guarantee the security or the preservation of the integrity of any transmitted data. Please consider this fact before transmitting via the Website any Personal Information or information that you consider confidential.

DZS safeguards the security of the personal information and other data provided to us with appropriate physical, administrative, and technical procedures. Inside DZS, personal information is stored in secure and controlled servers with limited access. Your information may be stored and processed in the United States or any other country where DZS and its subsidiaries are located. When you use our Websites, you are transferring information to the United States and other locations where DZS and its partners operate.

While we strive to protect personal information, we cannot guarantee the security of the personal information provided to us, as no transmission of information through the Internet can ever be completely secure. We urge individuals to protect their personal information when using the Internet by, for example, changing passwords often and using a combination of letters and numbers, and making sure to use a secure browser.

If we learn of a security system breach, we may attempt to notify you electronically by posting a notice on our Websites or by sending you an email. You may have a legal right to receive this notice in writing or in any other form required by applicable law.

Use of Cookies and Similar Technologies

A cookie is an alphanumeric set of characters that a website transfers to the cookie file of the browser on your computer so that our Websites can remember who you are. A cookie will typically contain the name of the domain from which the cookie has come, the “lifetime” of the cookie, and a value, usually a randomly generated unique number.

Similar technologies are tools that can be used instead of or in conjunction with cookies, such as web beacons / pixels, which are small, non-recognizable pictures downloaded to your computer when a specific site is loaded. We may also utilize third-party service providers to provide Website analytics on an aggregated and anonymous basis. When you visit our websites or read e-mail and social media from DZS, we may use cookies and similar technologies for the following purposes:

- To help us recognize you as a unique visitor (just a number) when you return to our Website
- To allow us to tailor content or offers to match your preferred interests
- To avoid showing you the same offers repeatedly
- To develop leads for our sales organization and our business partners and provide direct marketing communications to you if you have consented to receive such communications
- To compile anonymous, aggregated statistics that allow us to understand how users interact with our site
- To help us improve the structure or protect the security of our websites

Our Website uses the following categories of cookies

- **Performance Cookies:** These cookies collect information about how visitors use our Website, such as which pages visitors go to most often, and if they get error messages from web pages. The cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated, and therefore, anonymous.
- **Functionality Cookies:** These cookies allow a Website to remember choices you make (such as your language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts, and other parts of web pages you can customize. The information these cookies

collect may be anonymized, and they cannot track your browsing activity on other websites.

- **Targeting and Advertising Cookies:** These cookies are used to deliver advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement, as well as help measure the effectiveness of the advertising campaigns. They are usually placed by advertising networks with our permission. They remember that you have visited a website.
- **Session Cookies:** These are temporary cookies that remain in the cookie file of your browser until you leave the site), and persistent cookies (which remain in the cookie file of your browser for much longer, though how long will depend on the lifetime of the specific cookie).
- **Flash Cookies:** Certain features of our Websites may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Websites. Flash cookies are not managed by the same browser settings as are used for browser cookies.

We also use Google Analytics, a web analytics service provided by Google Inc. ("Google"), on our website. Google Analytics uses so-called "cookies", text files that are stored on your computer and allow an analysis of the use of the website by you. The information generated by the cookie about your use of this website is usually transmitted to Google and will be used to evaluate your use of the website, to compile reports on website activity and to provide other services related to website activity and internet usage to the website operator.

Disabling and Enabling Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. You can use your browser settings to withdraw your consent to our use of cookies at any time and delete cookies that have already been set. The website www.allaboutcookies.org contains comprehensive information about the process of opting out on different browsers. Note that by disabling certain categories of cookies you may be prevented from accessing some features of our Websites, or certain content or functionality may not be available.

If you are in the European Union (EU) and would like to opt out of third-party cookies relating to behavioural advertising, see www.youronlinechoices.eu. Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

IP anonymization is activated on this website, so your IP address will be shortened by Google beforehand within member states of the European Union or other parties to the Agreement on the European Economic Area. You can prevent the storage of cookies by a corresponding setting of your browser software; however, please note that if you do this, you may not be able to use all the features of this website to the fullest extent possible.

In addition, you may prevent the collection by Google of the data generated by the cookie and related to your use of the website as well as the processing of this data by Google by downloading the browser plug-in available under the following link and install:

<https://tools.google.com/dlpage/gaoptout>.

Do Not Track

There are different ways to prevent tracking of online activities. Some web browsers may allow you to enable a do-not-track feature that alerts the websites you visit that you do not want your online activities to be tracked. Our Websites may not recognize or react in response to do-not-track signals. At present, no universally accepted standards exist on how companies should respond to do-not-track signals. In the event a final universally accepted standard is established, we will assess and provide an appropriate response to these signals.

Your Privacy Rights and How to Contact Us

DZS encourages all individuals who provide personal information to DZS to keep their personal information accurate and up to date. Personal information may, in many cases, be updated by you online. You may also request to:

- Access your personal information
- Have your personal information corrected, restricted, or deleted
- Obtain the personal information you provide to us under a contract or with your consent in a structured, machine-readable format
- Have us share (port) this data with/to another controller

In addition, you can object to the processing of your personal information in some circumstances. These rights may be limited; for example, if fulfilling your request would reveal personal information about another person, or if you ask us to delete personal information that we are required by law to keep or have compelling legitimate interests in keeping.

If you have any concerns about how we process your data or would like to exercise any of your rights, you can contact us by emailing info@dasanzhone.com or by writing to DZS at 7195 Oakport Street, Oakland, CA 94621, USA. If you have unresolved concerns, you have the right to complain to a competent data protection authority.

Retention of Personal Information

DZS will retain your personal information as needed to fulfill the purposes for which it was collected, comply with our legal obligations, resolve disputes, and enforce our agreements.

Children and Privacy

Our Websites do not target and are not intended to attract children under the age of 13. DZS does not knowingly solicit personal information from children under the age of 13 or send them requests for personal information.

Third Party Sites

Our Websites may provide links to other third-party websites that are outside our control and not covered by this Policy. DZS is not liable for any information, content, products, services, software, or other materials available on or through an external website. The use of an external website or any information or other content found on external websites is subject to and governed by the terms and conditions of such website. We encourage you to review the privacy policies posted on these third-party websites.

Changes to Our Privacy Policy

DZS may amend this Policy from time to time, and if we make changes that affect the way we use your personal information, we will notify you by posting a revised statement on our Websites. Where appropriate, we will notify you by additional means.

Certain California Privacy Rights

Residents of California, under California Civil Code § 1798.83, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed personal information, for direct marketing purposes, during the preceding year. If you are a California resident and want information about how to exercise your third-party disclosure choices, please email us your request to info@dasanzhone.com.