

## **Icom America Privacy Policy**

**[Effective Date: April 09, 2021]**

Icom America understands that you care about how we collect, use, and share information when you interact with our websites, social media sites and handles, email, and online services (our “Services”), and we value the trust you place in us. This Privacy Policy explains:

- the types of information we collect through our Services;
- how we use and protect that information;
- the types of information we may share with others and under what circumstances;
- the choices you have regarding our collection, use, and sharing practices; and
- details regarding our use of third-party cookies and other tracking technologies.

We also include special disclosures for residents of California and Nevada.

This Policy applies when you interact with us through our Services. It also applies anywhere it is linked. It does not apply to non-Icom America websites and mobile applications that may link to the Services or be linked to from the Services; please review the privacy policies on those websites and applications directly to understand their privacy practices.

### **Information We Collect**

#### Information you give us

Our Services may permit you to enter contact information and other information about you. We collect and store any information you enter on our Services. This includes:

- Contact and demographic information.
- Payment card information.
- Information you provide when you complete a survey or participate in a rebate program.
- Information you submit to inquire about or apply for a job with us.
- For certain products, GPS location of the device, but only where you have requested that we track it.
- If you contact us, we may keep a record of that correspondence and any contact information provided.

#### Information We Collect From Other Sources

We may also receive information about you from other parties:

- Contact information and transaction information when you purchase a product through one of our dealers.
- Information about your interests, activities, and employment history from social networks and other places where you choose to share information publicly.
- Information about your interaction with advertisements on our Services, or ads that we place on third party websites, from online advertising companies.

#### Information We Collect Automatically

When you interact with the Services, we collect certain information about your use of our Services automatically. This includes:

- Analytics about your interaction with our Services, including traffic data, location data, weblogs and other communication data, the resources that you access, and how you reached our Services.
- Details regarding the device you use to access our Services, including, but not limited to, your IP address, operating system, and browser type.
- Information about how you interact with our ads and newsletters, including whether you open or click links in any correspondence.
- Information that you make available to us on a social media platform (such as by clicking on a social media icon linked from our Services), including your account ID or username and other information included in your posts.

### Cookies and Other Tracking Technologies

We use cookies and other technologies to provide features on our Services. We also partner with other companies that use these technologies to collect information about your use of our Services and your interaction with advertisements served on our behalf.

Specifically, Google Analytics, through the use of cookies or other tracking technologies, helps us analyze how users interact with and use our website, compiles reports on website activity, and provides other services related to our website activity and usage. The technologies used by Google may collect information such as your location, time of visit, whether you are a return visitor, and any referring website. You can learn more about Google's partner services and to learn how to opt out of tracking of analytics by Google on [Google's Privacy and Terms website](#).

### Combination of Information

We may combine information from the Services together and with other information we obtain from our business records.

### How We Use Your Information

We may use the information we collect about you for the following purposes:

- To provide you with our products and services, including to take steps to enter into a contract for sale or for services, process payments, fulfill orders, fulfill rebates, send service communications, and conduct general business operations such as accounting, recordkeeping, and audits.
- To provide you with product repairs and honor warranties.
- To give recommendations, deliver personalized marketing and advertising to you about our products and services, and to enable additional features on our Services and to provide you with a personalized service.
- To provide you with the best service and improve and grow our business, including to understand how our Services are being used, understand our customer base and purchasing trend, understand the effectiveness of our marketing, and develop new products and services.
- To protect and secure our Services, assets, network, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.

- To comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with legal requirements regarding the provision of products and services.

### **How We Secure the Information We Collect From or About You**

We use a combination of physical, technical, and administrative safeguards to protect the information we collect through the Services. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

### **How We Share Your Information**

We share information as follows:

**Service Providers:** We engage vendors to perform functions on our behalf, and they may receive information about you. These vendors are obligated by contract to use information that we share only for the purpose of providing these services. The business functions our vendors support include: billing and collection; auditing and accounting; professional services; analytics services; security; IT; and marketing emails.

**Social Media Platforms:** If you interact with us on social media platforms, the platform may be able to collect information about you and your interaction with us. If you interact with social media objects on our Services (for example, by clicking on a Facebook “like” button), both the platform and your connections on the platform may be able to view that activity. To control this sharing of information, please review the privacy policy of the relevant social media platform.

We share data with other members of our group of companies, who may use the data for the purposes outlined in this Policy.

**Government Entities:** We may also share data when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law enforcement requests, or where necessary to protect our property or rights or the safety of our employees, our Clients, or other individuals.

**Potential Purchasers of Our Business:** We may change our ownership or corporate organization while providing the Services. We may transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Policy.

We may use and share at our discretion data that has been aggregated (information that has been compiled into summaries) or de-identified (information that has been stripped of all unique identifiers such that it cannot be linked to a particular individual).

### **Cross-border Transfer of Data**

If you use our Services outside of the United States, you understand that we may collect, process, and store your information in the United States and other countries. The laws in the United States regarding information may be different from the laws of your country. Any such transfers will comply with safeguards as required by relevant law. By using the Services, you consent to the collection, international transfer, storage, and processing of your data.

## **Your Options and Rights Regarding Your Information**

**Email Unsubscribe:** If at any time you would like to unsubscribe from receiving future emails, you can click the unsubscribe link at the bottom of any email newsletter.

**Ad Choices:** You can learn more about ad serving companies and the options available to limit their collection and use of your information by visiting the websites for the [Network Advertising Initiative](#), the [Digital Advertising Alliance](#). Similarly, you can learn about your options to opt out of mobile app tracking by certain advertising networks through your device settings and by resetting the advertiser ID on your Apple or Android device.

Please note that opting out of advertising networks services does not mean that you will not receive advertising while using our Services or on other websites, nor will it prevent the receipt of interest-based advertising from other companies that do not participate in these programs. It will, however, exclude you from interest-based advertising conducted through participating networks, as provided by their policies and choice mechanisms. If you delete your cookies, you may also delete your opt-out preferences.

Most web browsers automatically accept cookies but, if you prefer, you can usually modify your browser setting to disable or reject cookies. If you delete your cookies or if you set your browser to decline cookies, some features of the Services may not be available, work, or work as designed. You may also be able to opt out of or block tracking by interacting directly with the other companies who conduct tracking through our Services.

Your browser or device may include “Do Not Track” functionality. We do not honor Do Not Track signals at this time.

## **California Consumer Privacy Act**

The California Consumer Privacy Act (“CCPA”) provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of information about them, as well as rights to know/access, delete, and limit sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights.

To the extent that we collect personal information that is subject to the CCPA, that information, our practices, and your rights are described below.

## **Notice at Collection Regarding the Categories of Personal Information Collected**

You have the right to receive notice of the categories of personal information we collect, and the purposes for which we use personal information. You also have the right to know about the sources of the personal information and to whom it is disclosed or sold. The categories we use below to describe personal information are those enumerated in the CCPA.

Entities to whom we disclose information for business purposes are service providers, which are companies that we engage to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose that is not related to our engagement.

Entities to whom we “sell” information are third parties. Under the CCPA, a business “sells” personal information when it discloses it to a company for monetary or other benefit. A company may be considered a third party either because the purpose for its sharing of personal information is not for an

enumerated business purpose under California law, or because its contract does not restrict it from using personal information for other purposes.

We collect this personal information from the sources described in the Information We Collect section [above](#) for the purposes described in the How We Use Your Information section [above](#).

<b>Information Type</b>	<b>Collected</b>	<b>Disclosed to?</b>	<b>Sold to?</b>
<b><i>Personal Identifiers</i></b>	<ul style="list-style-type: none"> <li>• Contact information (name, phone number, address)</li> <li>• Social media handles and account information</li> <li>• Unique identifiers (such as those assigned in cookies)</li> </ul>	Service Providers	Not sold
<b><i>Payment Information</i></b>	<ul style="list-style-type: none"> <li>• Payment card data</li> <li>• Bank account information</li> </ul>	Service Providers	Not sold
<b><i>Commercial Information</i></b>	<ul style="list-style-type: none"> <li>• Transaction information</li> <li>• Billing and payment records</li> <li>• Order history</li> </ul>	Service Providers	Not sold
<b><i>Geolocation Information</i></b>	<ul style="list-style-type: none"> <li>• Precise (e.g., via GPS)</li> <li>• Coarse information (e.g., ZIP code, IP address)</li> </ul>	Service Providers	Not sold
<b><i>Internet or Electronic Network Activity Information</i></b>	<ul style="list-style-type: none"> <li>• IP address</li> <li>• Device identifier (e.g., MAC)</li> <li>• Advertising identifier (e.g., IDFA, AAID)</li> <li>• Information provided in URL string (e.g., search keywords)</li> <li>• Cookie or tracking pixel information</li> <li>• Information about your interaction with our website, app, or email correspondence</li> </ul>	Service Providers	Not sold
<b><i>Inferences Drawn About You</i></b>	<ul style="list-style-type: none"> <li>• User profile</li> <li>• Interests</li> <li>• Preferences</li> </ul>	Service Providers	Not sold

We do not collect Health Information, Protected Classifications, Biometric Information, or Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information. We do not collect Professional or Employment-Related Information or Education Information unless you apply for a job with us, as described [below](#).

Personal information may be disclosed in additional, more limited circumstances, as described in How We Share Your Information [above](#).

### **Right to Opt Out of Sale of Personal Information to Third Parties**

You have the right to opt out of any sale of your personal information by Icom America to third parties. However, we do not engage in any disclosures that would be considered sales of data under the CCPA.

Please note that your right to opt out does not apply to our sharing of personal information with service providers.

### **Right to Know and Request Access to and Deletion of Personal Information**

You have the right to request access to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third

parties and service providers with whom we share it. You also have the right to request in certain circumstances that we delete personal information that we have collected directly from you. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

### How to Submit an Access or Deletion Request

You may submit a request to exercise your rights to know/access or delete your personal information through the following means:

- (1) By filling out a Consumer Data Request Form available [here](#).
- (2) By calling us at 800-USA-ICOM (800-872-4266).

You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

### Verification Procedures

In order to process your request to know/access or delete personal information we collect, disclose, or sell, we must verify your request. We verify your identity by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email or telephone account stated in the request.

We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

### **Special Information for Job Applicants**

When you apply for a job with Icom America, we collect certain information about you as outlined in this Policy. Information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference.

The following table describes our practices with regard to information submitted in the job application process. If you use our website in the job application process, additional information may be automatically collected, as described above.

<b>Information Type</b>	<b>Collected</b>	<b>Disclosed to?</b>	<b>Sold to?</b>
<b><i>Personal Identifiers</i></b>	<ul style="list-style-type: none"> <li>• Contact information (name, phone number, address)</li> <li>• Social media handles and account information</li> </ul>	Service Providers	Not sold
<b><i>Protected Classifications</i></b>	<ul style="list-style-type: none"> <li>• Race and ethnicity</li> <li>• Date of Birth</li> </ul>	Service Providers	Not sold
<b><i>Geolocation Information</i></b>	<ul style="list-style-type: none"> <li>• Coarse information (e.g., ZIP code, IP address)</li> </ul>	Service Providers	Not sold
<b><i>Professional or Employment-Related Information</i></b>	<ul style="list-style-type: none"> <li>• Current employer</li> <li>• Employment history</li> </ul>	Service Providers	Not sold
<b><i>Education Information</i></b>	<ul style="list-style-type: none"> <li>• Education history</li> <li>• Level of education</li> </ul>	Service Providers	Not sold

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

### **Special Information for Nevada Residents**

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to other companies who will sell or license their information to others. At this time, Icom America does not engage in such sales. If you are a Nevada resident and would like more information about our data sharing practices, please [contact us](#).

### **Changes to This Policy**

We may make changes to this Policy from time to time. The “Effective Date” at the top of this page indicates when this Privacy Policy was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Policy.