

## Privacy Policy

**Last Updated: July 2, 2025**

SPC Electronics America, Inc. and its affiliates (collectively “us,” “we,” or “our”) are committed to safeguarding the privacy of our customers and users (“your” or “your”) who visit our website, [www.spcamerica.com](http://www.spcamerica.com) (the “Website”).

We have drafted this Privacy Policy to provide you with information on our policies regarding the collection, use, and disclosure of Personal Information (as defined below) when you use our Website. This Privacy Policy should be read in conjunction with our Cookie Policy and Terms and Conditions.

Some jurisdictions may provide for additional privacy rights and disclosures to their residents or relevant data subjects that may apply to you in certain circumstances. For example, your Personal Information may be subject to the EU General Data Protection Regulation (“GDPR”), the UK GDPR, the California Consumer Privacy Act (along with any implementing regulations and as may be amended, the “CCPA”), or other relevant data protection laws. If your personal information (as defined in our California Privacy Statement) is subject to the CCPA, please see our California Privacy Statement for additional disclosures, our Notice at Collection, and a description of your rights under the CCPA, available [here](#).

### Information We Collect and How We Collect It

While using our Website or when you otherwise interact with us, we may collect certain information from or about you, including “Personal Information.” When we use the term “Personal Information” we mean information that can help us directly or indirectly identify you, such as your name, email address, home address, telephone number, Internet Protocol (“IP”) address, or other online identifiers, among other information. We may collect some of this information directly from you, automatically through your use of the Website, and from other sources.

### Information Provided by You

We may collect Personal Information when you (i) purchase, send for repair, or return one of our products; (ii) contact us through available forms on the Website, via email, or through our customer service lines; (iii) complete surveys provided by us; (iv) post or share information on our Website; and (v) create an account to use certain of our services.

Depending on how you interact with us, we may collect the following types of Personal Information, including:

- *Identifiers and Similar Information* – Such as your first and last name, date of birth, social security number, driver’s license number, passport number, online identifiers, or other similar identifiers, and account log-in information.
- *Contact Information* – Including your personal email address, business email address, postal address, or phone number.

- *Payment Information* – Such as your payment card and billing address.
- *Commercial Information* – Including records of services or products purchased.
- *Demographic Information* – Such as your gender, age, citizenship, education, profession, or occupation.
- *Correspondence and Communications* – Including information provided by you when you contact us directly, respond to a survey, or interact with us on social media.
- *Responses to Surveys and Promotional Events* – Including responses to questions and interactions with us on social media, competitions, and at events or through surveys that we provide to you.
- *Geolocation Information* – Such as information about your location or the location of your device.

Please note that depending on your jurisdiction, some of this information may be considered sensitive personal information or similarly defined information under certain data protection laws.

#### Information Collected Automatically

When you visit our Website or interact with us through other online media and advertisements, information about your visit and/or interaction is automatically logged through the use of various tracking tools like browser cookies and web beacons. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and transferred to your device. We generally use cookies to collect information in order to improve our services for you. We may automatically collect Personal Information through our Website and these tools, including the following:

- *Log Data* – This includes information that your browser sends whenever you visit our Website (“Log Data”). This Log Data may include information such as your computer’s IP address, browser type, browser version, the pages of our Website that you visit, the time and date of your visit, the time spent on those pages, and other statistics. When you access the Website by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device’s unique device ID, the IP address of your mobile device, your mobile operating system, the type of mobile Internet browser you use, your location information, and other statistics.
- *Website Browsing Data* – This includes information gathered while you browse our Website, including technical, usage, and navigational data that shows what pages you have visited and how long various features are used.

- [*Device Information* – Such as information about the device you use to access our Website, including the hardware model, operating system and version, unique device identifiers, and mobile network information.]
- [We may use third-party web analytics services on the Website, including Google Analytics. We use Google Analytics to help us understand how people are using our Website. To find out more about how Google Analytics collects and processes data, please click [here](#). Google Analytics has its own cookies that it uses to track and aggregate this information. You can prevent the use of Google Analytics relating to your use of our Website by downloading and installing the browser plugin available [here](#).

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. The Help feature on most browsers provides information on how to accept cookies, disable cookies, or to notify you when receiving a new cookie. You can also control cookies (i) through most browsers by changing your cookie settings, which are typically found in the “options” or “preferences” menu of your browser, and (ii) through various third-party tools, which can be found [here](#).

Please note that if you do not accept cookies, you may not be able to use some features of our Website, and we recommend that you leave them turned on.

#### Information from Other Sources

We may also obtain Personal Information from other sources, such as:

- Indirectly from our distributors or sales agents.
- Directly or indirectly from our service providers when providing us services or acting on our behalf.
- Directly or indirectly from activity on our Website [([www.spcamerica.com](http://www.spcamerica.com))], social media, or marketing efforts.
- From third parties that interact with us in connection with the products we sell or services we perform, including advertising companies or other third-party advertising providers.

#### **Why We Collect and Use Information**

We may collect, use, or otherwise process Personal Information for various purposes, including:

- *Perform Services for Customers* – Including facilitating purchases, providing products or services, maintaining or servicing accounts, providing customer service, and processing customer requests.
- *Communicate and Respond to Your Questions* – Such as to respond to any questions you send to us or where a problem with the Website or a service is reported.

- *Improve Our Products and Services* – For example, we might use your information to customize your experience with us, tailor online shopping experiences, and improve our customer service.
- *Managing and Operating our Website* – Including to keep our Website updated and relevant, to develop our business, and to inform our marketing strategy.
- *Security and Prevention and Detection of Fraud* – For example, we may use information to protect our company, our customers, and our Website. This includes detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity.
- *Compliance with Law* – Such as compliance with legal and/or regulatory requirements or for the purpose of responding to a binding request from a public authority or court.
- *Advertising* – Including to provide you with information, products, or services we feel may interest you.
- *Contractual Obligations* – For example, we may use your information in performing our contractual obligations to a customer or others and protecting legal rights.

Certain data protection laws may require that we have established a lawful basis or legal basis for our collection, use, disclosure, or other processing of your Personal Information. Where required by applicable data protection laws, we ensure that we have identified a lawful or legal basis under which such processing may occur. Depending on how you interact with us and our purpose for processing your Personal Information, such lawful or legal basis for processing Personal Information may include:

- where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- to comply with certain legal and regulatory requirements;
- depending on the circumstances, we may need to process your Personal Information for the performance of a contract to which you are a party or related pre-contractual steps; and
- with your consent, as required by the GDPR.

### **How We Disclose Information**

In order to run our business and provide services to you, we may disclose your Personal Information and other information to third parties, including the following:

- Our affiliates
- Services providers or other entities who perform services for us or on our behalf. For example, we may share information with vendors who operate our Website, run promotions, and send emails.

- Business partners who distribute our products or co-sponsor a promotion with us. These partners may send you information about events and products by mail or email.
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with products or services we provide to you.
- In order to comply with applicable law. For example, we may disclose your Personal Information where required to do so by law or subpoena or if we believe that such action is necessary to comply with the law and the reasonable requests of law enforcement or to protect the security or integrity of our Website.
- To any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets.
- With your consent or at your direction.

### **Do Not Track Disclosure**

We support Do Not Track (“DNT”). DNT is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable DNT by visiting the Preferences or Settings page of your web browser.

### **Security**

The security of your Personal Information is important to us, and we strive to implement and maintain reasonable, commercially acceptable security procedures and practices appropriate to the nature of the information we store, in order to protect it from unauthorized access, destruction, use, modification, or disclosure.

However, please be aware that no method of transmission over the internet or method of electronic storage is 100% secure, and we are unable to completely guarantee the security of the Personal Information we have collected from or about you.

### **How Long We Keep Your Information**

We will only retain your Personal Information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any accounting, reporting requirements, or legal requirements and consistent with applicable privacy, data protection, and data retention laws. To determine the appropriate retention period for Personal Information, we consider the amount, nature, and sensitivity of the Personal Information, the potential risk of harm from unauthorized use or disclosure of your Personal Information, the purposes for which we process your Personal Information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## Links to Other Sites

Our Website may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

## Children's Privacy

We do not knowingly solicit or collect Personal Information from children under 13. If you are a parent or guardian and believe that we have inadvertently collected Personal Information from a child under 13 years old, please contact us using the information provided in **Contact Us** below. We will delete such information within a reasonable time.

## International Transfers of Your Personal Information

We are an international company with our main operating location(s) in the U.S. As such, your Personal Information may be transferred, stored, or otherwise processed in the United States and other locations. When you provide Personal Information to us from outside of the U.S., please be aware that we will receive and process it in the U.S. and that U.S. data protection laws may be different from those of your country of residence. We may transfer the Personal Information we collect to other countries where we do business, which may not have the same data protection laws as the country in which you originally provided the information. To the extent required by applicable law, when we transfer your Personal Information to recipients in other countries, we will take measures to protect that information. You can contact us through the information provided in **Contact Us** below for further information on specific mechanisms we utilize for transferring Personal Information and the countries to which such transfer may be made.

## Your Rights and How to Exercise Them

### Your Rights Under Certain Data Protection Laws

Depending on where you are located and applicable laws, you may have certain rights to your Personal Information. The rights described in this section are subject to exemptions and other limitations under applicable law.

Depending on applicable law, and subject to certain exemptions or limitations, your rights may include:

- *Access* – To request access to the Personal Information we have about you.
- *Correction* – To request that we correct incomplete or inaccurate Personal Information that we hold about you.
- *Deletion* – In certain circumstances and subject to certain limitations, you can request that we delete your Personal Information.

- *Object to Processing* – To object to our processing of Personal Information in certain circumstances, including where we process Personal Information for direct marketing purposes or where we have processed such data on the basis of our legitimate interests.
- *Request the Restriction of Processing* – In certain circumstances, to request that we suspend the processing of your Personal Information.
- *Portability* – To request the transfer of your Personal Information to another party in a digital form.
- *Withdraw Consent* – Where you have provided your consent to our processing, you have the right to withdraw it at any time.
- *Lodge a Complaint with a Data Protection Authority* – To lodge a complaint with the relevant data protection authority or other relevant supervisory authority in the country of your residence, your place of work, or place of an alleged infringement, if you believe that the processing of your Personal Information infringes upon applicable data protection laws.

You may also have the following rights related to our marketing practices:

- *Opt Out of Receiving Our Marketing Emails* – To stop receiving our promotional emails, follow the opt-out link in any of our promotional emails. This opt-out does not apply to transactional or informational emails (e.g., our communication in response to your request for information, products, or services from us) nor to disclosure to a third party that is acting on our behalf and under our instructions in support of our permitted uses of your Personal Information.
- *Control Cookies and Tracking Tools* – As noted above in **Information Collected Automatically**, we may use cookies and other tracking tools. To learn how to manage your cookies preferences, please review **Information Collected Automatically** and our Cookies Policy.

### How to Exercise Your Rights

You can exercise applicable rights, as described above, through the following:

- Email: [sales@spcamerica.com](mailto:sales@spcamerica.com)
- SPC Electronics America, Inc. 579 Clyde Ave., Ste 320, Mountain View, CA 94043

### **Changes to This Privacy Policy**

This Privacy Policy is effective as of July 2, 2025, and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time, and you should check this Privacy Policy periodically. Your continued use of the Website after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us or by placing a prominent notice on our website.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us through any of the following:

- Emailing us at: [sales@spcamerica.com](mailto:sales@spcamerica.com)
- Writing to us at:

SPC Electronics America, Inc. 579 Clyde Avenue, Suite 320, Mountain View, CA 94043

**[CALIFORNIA PRIVACY STATEMENT – NOT “SELLING” OR “SHARING”]**

Privacy Policy  
**PRIVACY STATEMENT – CALIFORNIA**  
 Last Updated: January 1, 2023

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Statement of Mitsubishi Electric US, Inc. and its affiliates (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this California Privacy Statement (“**CA Privacy Statement**”) to comply with the California Consumer Privacy Act of 2018 (with any implementing regulations and as may be amended from time to time, “**CCPA**”) and other California privacy laws. If you are a California resident, please review this CA Privacy Statement for disclosures required by the CCPA, including our Notice at Collection and information surrounding how and why we collect, use, and disclose personal information and information about your potential rights under the CCPA. The rights described herein are subject to exemptions and other limitations under applicable law. Any terms defined in the CCPA have the same meaning when used in this notice. We are a “business.”

Notice at Collection and Use of Personal Information	Our Collection, Use, and Disclosure of Personal Information
Your Rights and Choices	Contact Information
Changes to Our Privacy Notice	

**NOTICE AT COLLECTION AND USE OF PERSONAL INFORMATION**

***Information We Collect***

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“**personal information**”).

Depending on how you interact with us, we may collect the following categories of personal information, including:

- Identifiers – Such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
- Personal information described in subdivision (e) of Section 1798.80 (California Customer Records statute) - This includes any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s

license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

- Demographic Information – Including, but not limited to, age or gender. This category includes pieces of personal information that also qualify as a protected classification characteristics under applicable laws.
- Commercial Information – Including, but not limited to, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- Internet or Network Activity – Such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
- Geolocation Data – Such as physical location or movements.
- Professional or Employment-Related Information – Such as occupation, compensation, employer, and title.
- Audio, Electronic, or Visual Information – Including call and video recordings.
- Inferences – Including information about your interests and preferences.
- Sensitive Personal Information – Such as your passport number, driver’s license, and state identification card.

Personal information does not include:

- Publicly available information as defined under the CCPA.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope.

### ***Use and Collection of Personal Information***

We may collect or use personal information for one or more of the following purposes, such as:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in relation to a purchase, warranty submission, referral form, etc., we will use that information in conjunction with that specific purpose.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.

- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- 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 litigation requirements, 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 evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets.

We do not sell or share personal information (as those terms are defined under the CCPA).

### ***How Long We Keep Your Information***

- We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any accounting, reporting requirements or legal requirements and consistent with applicable privacy, data protection and data retention laws. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.
- For more information about our privacy practices, please review our entire CA Privacy Statement, which is available [here](#).

## **OUR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION**

### ***Information We Have Collected***

In the preceding 12 months, and depending on how you interact with us, we may have collected the categories of personal information listed above in [Information We Collect](#).

### ***Sources of Personal Information***

We may obtain the categories of personal information listed above from the following categories of sources, such as:

- Directly from our customers related to their purchases of products or services and related warranties.
- Indirectly from our distributors or sales agents.
- Directly and indirectly from activity on our website ([www.us.mitsubishielectric.com](http://www.us.mitsubishielectric.com)), social media, or marketing efforts.
- From third-parties that interact with us in connection with the products we sell or services we perform.

***Purposes for Collecting Personal Information***

We may collect your personal information for the business or commercial purposes described above in Use and Collection of Personal Information.

***Disclosure of Personal Information***

We may disclose your personal information to a third party for a business purpose in compliance with the CCPA. In the preceding twelve (12) months, we may have disclosed for a business purpose, the categories of personal information to the categories of third parties described in the chart below, including :

<b>Category of Personal Information</b>	<b>Category of Third Party Information Disclosed to for a Business Purposes</b>
Identifiers (for example your name, address, DOB, SSN, driver’s license, passport number and online identifiers)	<ul style="list-style-type: none"> <li>• Professional services organizations, such as auditors and law firms that assist with our legal and regulatory compliance obligations</li> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Internet service providers</li> <li>• Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.)</li> <li>• Social networks, recruiting agencies and other similar third-party websites that support our recruitment and marketing efforts</li> </ul>
Additional information subject to Cal. Civ. Code § 1798.80(e) (for example, a signature, state identification card number,	<ul style="list-style-type: none"> <li>• Affiliated entities</li> <li>• Business partners</li> </ul>

<p><b>Category of Personal Information</b></p>	<p><b>Category of Third Party Information Disclosed to for a Business Purposes</b></p>
<p>financial information, or bank account information)</p>	
<p>Characteristics of protected classifications under certain federal or state laws (for example gender, age, national origin, citizenship or marital status)</p>	<ul style="list-style-type: none"> <li>• Professional services organizations, such as auditors and law firms that assist with our legal and regulatory compliance obligations</li> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.)</li> <li>• Social networks, recruiting agencies and other similar third-party websites that support our recruitment and marketing efforts</li> <li>• Affiliated entities</li> <li>• Business partners</li> </ul>
<p>Commercial Information (for example records of products or services purchased, obtained or considered or purchasing histories)</p>	<ul style="list-style-type: none"> <li>• Professional services organizations, such as auditors and law firms that assist with our legal and regulatory compliance obligations</li> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Internet service providers</li> <li>• Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.)</li> <li>• Social networks, recruiting agencies and other similar third-party websites that support our recruitment and marketing efforts</li> <li>• Affiliated entities</li> <li>• Business partners</li> </ul>
<p>Geolocation Data (such as information about your location or the location of your device)</p>	<ul style="list-style-type: none"> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Internet service providers</li> </ul>

Category of Personal Information	Category of Third Party Information Disclosed to for a Business Purposes
	<ul style="list-style-type: none"> <li>• Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.)</li> <li>• Affiliated entities</li> <li>• Business partners</li> </ul>
Professional or Employment Related Information, including occupation, compensation, employer and title	<ul style="list-style-type: none"> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.)</li> <li>• Affiliated entities</li> <li>• Business partners</li> </ul>
Internet or Electronic Network Activity Information, including interactions with our website or use of certain online tools	<ul style="list-style-type: none"> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Internet service providers</li> </ul>
Inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information	<ul style="list-style-type: none"> <li>• Advertising partners that provide us with advertising and marketing services</li> <li>• Analytics providers to measure how you interact with our website or other services</li> <li>• Affiliated entities</li> </ul>

In the preceding twelve (12) months, we have not sold or shared any personal information. We do not knowingly sell or share personal information of consumers under 16 years of age.

In addition, we may disclose, and in the preceding 12 months, we may have disclosed all of the categories of personal information identified above in Information We Collect, to the following categories of third parties: (i) judicial courts, regulators, or other government agents purporting to have jurisdiction over us, our subsidiaries or our affiliates, or opposing counsel and parties to litigation; (ii) any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets; and (iii) other third parties as may otherwise be permitted by law. We may disclose personal information to all of the third parties listed above to comply with our legal obligations or for the business or commercial purposes identified in Use and Collection of Personal Information. Additionally, we may disclose your personal information to third parties upon your request, at your direction or with your consent.

We may also disclose or make available your personal information to our service providers or contractors such as our *[IT providers, or CRM provider,]* other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in. or as otherwise permitted by, the CCPA.

### ***Our Use and Disclosure of Sensitive Personal Information***

As noted above, under the CCPA, certain personal information we collect and process may be considered “sensitive personal information.” The CCPA requires that we provide you with a right to limit our use or disclosure of such sensitive personal information in certain circumstances. Currently, we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit.

## **YOUR RIGHTS AND CHOICES**

The CCPA provides consumers with specific rights regarding their personal information, subject to applicable exemptions and limitations. Specifically, consumers may have the right to:

- Be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used.
- Not be discriminated against because you exercise any of your rights under the CCPA
- Request that we delete any personal information about you that we collected or maintained, subject to certain exceptions (“Request to Delete”);
- Opt-out of the “sale” (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not);
- Opt-out of the “sharing” (as that term is defined in the CCPA) of your personal if a business shares your personal information with third parties (we do not);
- Limit the use and disclosure of sensitive personal information (“Right to Limit”) (please note that we are not using your sensitive personal information for purposes that would require that we provide you with a Right to Limit);
- Correct inaccurate personal information (“Right to Correct”); and
- Request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you certain information about such activities (“Request to Know”).

Below, we provide more detail on your CCPA rights and how to exercise those rights.

### ***Right to Know Requests***

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 the following to you, unless a limitation or exception applies:

- The categories of personal information we collected about you.

- The categories of sources from which personal information is collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal information.
- The categories of third parties to whom the business discloses personal information.
- The specific pieces of personal information we have collected about you.

### ***Right to Delete Requests***

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. Once we receive and confirm your verifiable consumer request, we will delete your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to conduct certain activities, including:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes. Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the context in which the consumer provided the information.
- Comply with a legal obligation.

### ***Right to Correct Requests***

You have the right to request that we correct inaccurate personal information that we maintain about you. In reviewing your request, we will take steps to determine the accuracy of the

personal information that is subject to your Request to Correct, and, as permitted by law, may deny your request in certain circumstances.

### ***Right to Limit the Use and Disclosure of Sensitive Personal Information***

Under certain circumstances, you may have the Right to Limit our use and disclosure of your sensitive personal information. As noted above, we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights, unless otherwise permitted by the CCPA.

### ***Exercising Consumer Rights***

To exercise the consumer rights described above, please submit a verifiable consumer request to us by either:

- Calling us toll free 877.362.8745
- Email: [sales@spcamerica.com](mailto:sales@spcamerica.com)
- SPC Electronics America, Inc. 6680 Jones Mill Ct., Ste G, Norcross, GA 30092

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information twice within a twelve-month period. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on your behalf. We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request. Your request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name, phone number and email address, and we may require you to discuss the request with us over the phone. This measure is in place to help ensure that personal information is not disclosed to any person who does not have the right to receive it.
- 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. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

**[OTHER CALIFORNIA RIGHTS*****Shine the Light***

California's "Shine the Light" law permits customers in California to request certain details about how certain types of their information are disclosed to third parties and, in some cases, affiliates, for those third parties' and affiliates' own direct marketing purposes. You have the right to ask us one time each year if we have disclosed personal information (as defined under the Shine the Light law) to third parties for their direct marketing purposes.

***Do Not Track***

We support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked. You can enable or disable DNT by visiting the Preferences or Settings page of your web browser.]

**CHANGES TO OUR CA PRIVACY STATEMENT**

We reserve the right to amend this CA Privacy Statement at our discretion and at any time.

**CONTACT INFORMATION**

This CA Privacy Statement is available in alternative formats upon request. If you have any questions or comments about this notice, this CA Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or to request this CA Privacy Statement in an alternative format, please do not hesitate to contact us at:

- Calling us toll free 877.362.8745
- Email: [sales@spcamerica.com](mailto:sales@spcamerica.com)
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