



ADTRAN Corporate Privacy Policy

ADTRAN, Inc. and its subsidiaries (“ADTRAN,” “we,” or “us”) respect individual privacy, and strive to properly address legal requirements applicable to data protection. This ADTRAN Corporate Privacy Policy provides information about how ADTRAN collects, uses and discloses certain personally identifiable information that we receive (“Personal Data”) about consumers, corporate customers, suppliers, vendors, business partners, job applicants, independent contractors and other third-parties (collectively “you”).

Information We Collect About You and How We Collect It

We may collect Personal Data as you use www.adtran.com and our other websites, microsites and subdomains (collectively, our or the “**Website**”), purchase and use our products and services, and interact with us. “Personal Data” includes any information that can be used to identify an individual, and may include name, position/title, postal address, email address, phone and fax numbers, and login information (username, password).

ADTRAN will only process Personal Data in ways that are compatible with the purpose that ADTRAN collected it for, or for purposes an individual later authorizes. Before we use your Personal Data for a purpose that is materially different than the purpose we collected it for or that you later authorized, we will provide you with the opportunity to opt out. ADTRAN maintains reasonable procedures to help ensure that Personal Data that is collected is reliable for its intended use, accurate, complete, and current.

ADTRAN may collect and use the following data:

- Company data (corporate name, street address, shipping address, ZIP Code, city, first and last names of officers and directors, dates of birth of officers and directors where provided to ADTRAN in accordance with applicable contractual or legal requirements, commercial register number);
- Personal Data of natural persons representative of companies (form of address (Mr./Mrs., etc.), first and last name, position/title, e-mail address, telephone number, and, if applicable, street address, ZIP code, and city); and
- Data necessary and incident to the performance of any agreement between you and ADTRAN and business in the ordinary course.

In addition, we collect several types of information from and about users of our Website, including information:

- That is about you but individually may not identify you, such as usernames and passwords; and/or
- About your internet connection, the equipment you use to access our Website and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners.

Information You Provide to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to services we provide, posting material,

or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with any of our Website.

- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. For example, you may be required to provide financial information before placing an order through our Website.
- Your search queries on our Website.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of our Website, or transmitted to other users of our Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages and/or you may set certain privacy settings for such information by logging into your account profile, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of our Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information We Collect Through Automatic Data Collection Technologies. As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website; and
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). The information we collect automatically is statistical data and does not include Personal Data, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Websites according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Websites.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A browser cookie, commonly referred to as a cookie, is a small file placed on the hard drive of your computer through your web browser. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Websites. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Websites.
- **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. For information about managing your privacy and security settings for Flash cookies, see:

Choices About How We Use and Disclose Your Information

- **Web Beacons.** Pages of our Websites and our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit ADTRAN, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

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. 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>.

For more information about Google Terms of Use and Privacy, please visit:
<https://www.google.com/intl/en/policies>.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any Personal Data:

- To provide you with information, products, or services that you request from us.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To present our Website and their contents to you.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To manage job applications.
- In any other way we may describe when you provide the information.
- To fulfill any other purpose for which you provide it.
- For any other purpose with your consent.

We may also use your information to contact you about our own and third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please email privacy@adtran.com. For more information, see:

Choices About How We Use and Disclose Your Information

We may use the information we have collected from you to enable us to display advertisements to our advertisers' target audiences. Even though we do not disclose your Personal Data for these

purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of ADTRAN's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by ADTRAN about users of our Website is among the assets transferred.
- To third parties to market their products or services to you if you have consented to/not opted out of these disclosures. We contractually require these third parties to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. For more information, see:

Choices About How We Use and Disclose Your Information

- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- For any other purpose with your consent.

We may also disclose your Personal Data:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, or to meet national security or law enforcement requirements.
- To enforce or apply our **WEBSITE TERMS OF USE** and **COMMERCIAL TERMS OF SALE** including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of ADTRAN, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's website. If you disable or refuse cookies, please note that some parts of the Website may then be inaccessible or not function properly.
- **Promotional Offers from ADTRAN.** If you do not wish to have your email address and/or contact information used by ADTRAN and affiliated third-parties to promote our own or such affiliated third parties' products or services, you can opt-out by sending us an email stating your request to privacy@adtran.com. If we have sent you a promotional email, you may opt-out by following the unsubscribe instructions attached to each email to be omitted from any future email

distributions. This opt out does not apply to information provided to ADTRAN as a result of a product purchase, warranty registration, product service experience or other transactions.

- **Targeted Marketing Communications.** If you do not want us to use information that we collect or that you provide to us to deliver marketing communications according to target-audience preferences, you can opt-out by emailing privacy@adtran.com.

Accessing and Correcting Your Information

You may send us an email at privacy@adtran.com to request access to, correct or delete any Personal Data that you have provided to us. We cannot delete your Personal Data except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete any User Contributions from our Websites, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Websites, including User Contributions, is governed by the ADTRAN **WEBSITE TERMS OF USE**.

Your California Privacy Rights

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@adtran.com or write us at: ADTRAN, Inc., c/o Legal & Contracts, 901 Explorer Blvd., Huntsville, Alabama 35806.

Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of our Websites like message boards. The information you share in public areas may be viewed by any users of the Websites.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our Websites. Any transmission of Personal Data is at your own risk.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page with a notice that the privacy policy has been updated on the home page of www.adtran.com. If we make material changes to how we treat our users' Personal Data, we will notify you through a notice on the home page of www.adtran.com. The date the Privacy Policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting www.adtran.com and this Privacy Policy to check for any changes.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at privacy@adtran.com.

EU-US Privacy Shield

The following terms apply only to the collection, use, and retention of personal data transferred from the European Union.

ADTRAN recognizes that the European Union (“EU”) has adopted the EU General Data Protection Regulation (“GDPR”) which requires “adequate protection” for the transfer of personally identifiable information about individuals in the EU to ADTRAN operations in the US.

To provide adequate protection for certain personally identifiable information received by ADTRAN in the US, ADTRAN complies with the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States. ADTRAN has certified to the Department of Commerce that it adheres to the Privacy Shield Principles of Notice, Choice, Accountability for Onward Transfer, Security, Data Integrity and Purpose Limitation, Access, and Recourse, Enforcement, and Liability. In addition, ADTRAN is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

Onward Transfer; Data Transfers to Third Parties. We may share Personal Data with third-party agents or service providers who perform functions on our behalf for the purpose of: operating our business; delivering, improving, and customizing our websites, products, and services; sending marketing and other communications related to our business; and for other legitimate purposes permitted by applicable law or otherwise with your consent. Where required by Privacy Shield, we enter into written agreements with those third-party agents and service providers requiring them to provide the same level of protection Privacy Shield requires and limiting their use of the data to the specified services provided on our behalf. We take reasonable and appropriate steps to ensure that third-party agents and service providers process personal information in accordance with our Privacy Shield obligations and to stop and remediate any unauthorized processing. Under certain circumstances, we may remain liable for the acts of our third-party agents or service providers who perform services on our behalf for their handling of personal information that we transfer to them.

Third-Party Data Controllers. In some cases we may transfer Personal Data to unaffiliated third-party data controllers. These third parties do not act as agents or service providers and are not performing functions on our behalf. We will only provide your Personal Data to third-party data controllers where you have not opted-out of such disclosures, or in the case of sensitive Personal Data, where you have opted-in if the Privacy Shield requires consent. We enter into written contracts with any unaffiliated third-party data controllers requiring them to provide the same level of protection for Personal Data the Privacy Shield requires. We also limit their use of your Personal Data so that it is consistent with any consent you have provided and with the notices you have received.

Access Rights. You may have the right to access the Personal Data that we hold about you and to request that we correct, amend, or delete it if it is inaccurate or processed in violation of Privacy Shield. These access rights may not apply in some cases, including where providing access is unreasonably burdensome or expensive under the circumstances or where it would violate the rights of someone other than the individual requesting access. If you would like to request access to, correction, amendment, or deletion of your Personal Data, you can submit a written request to privacy@adtran.com. We may request specific information from you to confirm your identity. In some circumstances we may charge a reasonable fee for access to your information. If you become aware of changes or inaccuracies in your Personal Data, you are responsible for informing ADTRAN in writing to the contact provided below of such changes so that the Personal Data may be updated or corrected.

Questions or Complaints. In compliance with the Privacy Shield Principles, ADTRAN commits to resolve complaints about our collection or use of your personal information. EU individuals with inquiries or complaints regarding our Privacy Shield policy should first contact ADTRAN at: privacy@adtran.com.

We will investigate and attempt to resolve any complaints or disputes regarding the use or disclosure of your Personal Data within 45 days of receiving your complaint. ADTRAN has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints concerning Personal Data transferred from the EU. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please contact the EU DPAs for more information and assistance or to file a complaint. Information regarding local contact information for local data protection authorities can be found at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

You may have the option to select binding arbitration for the resolution of your complaint under certain circumstances, provided you have taken the following steps: (1) raised your complaint directly with ADTRAN and provided us the opportunity to resolve the issue; (2) made use of the independent dispute resolution mechanism identified above; and (3) raised the issue through the relevant data protection authority and allowed the US Department of Commerce an opportunity to resolve the complaint at no cost to you. For more information on binding arbitration, see US Department of Commerce's Privacy Shield Framework: Annex I (Binding Arbitration) at <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.
