



## Eratronix Privacy Notice

Last updated as of 3/14/2024

PLEASE CLICK [HERE](#) FOR A DOWNLOADABLE PRINTER-FRIENDLY COPY OF THIS PRIVACY NOTICE

Thank you for visiting Eratronix, Inc.'s ("Eratronix ", "we", "us", "our") Internet web site located at [www.eratronix.com](http://www.eratronix.com) ("Site").

This privacy policy tells you about how we use, protect and disclose your personal data that we have collected using both offline means (e.g. via phone, post, in-person meetings and other correspondence) and online means, such as when you use any website or mobile application owned or operated by Eratronix, including Eratronix.com and its local sub-domains and our blogs and programs (collectively, the "Site").

You acknowledge that your personal data (including personal data collected through your use of our services, and the Site), will be collected, stored, shared and processed in accordance with this privacy policy.

The Site may contain links to other third-party websites or applications. Please be aware that these websites and applications may collect information about you. These websites and applications may have their own privacy notices or policies. We encourage you to be aware when you leave the Site and to read the privacy statements of each and every website and application that you use.

To the extent any linked websites or applications you visit are not owned or operated by Eratronix, please be aware that we are not responsible or liable for the websites' or applications' content, any use of the websites or applications, or the privacy and security practices and policies of those websites or applications.

This Privacy Notice and our [Cookie Notice](#) cover our Site and any other websites, products, software, applications, data feeds, content, or services on which authorized links to this Privacy Notice and Cookie Notice are posted.

If you have any questions, comments, or concerns regarding this Privacy Notice and/or our data practices, or would like to exercise your rights, do not hesitate to contact us at: [privacynotice@eratronix.com](mailto:privacynotice@eratronix.com)

**IF YOU ARE A CALIFORNIA RESIDENT:** If you are a resident of California, this entire Privacy Notice applies to you. However, please see the section titled "Additional Notices for California Consumers" below, which will inform you in detail about our information collection practices and your specific rights.



**IF YOU ARE AN INDIVIDUAL LOCATED IN THE EEA:** If you are located in the European Economic Area ("EEA"), this entire Privacy Notice applies to you. However, please see the Section titled "Additional Information for Users in the European Economic Area" below, which will inform you in detail about our legal bases for processing and your rights regarding the processing of your personal data.

**IF YOU ARE A RESIDENT OF NEVADA:** If you are a resident of Nevada, this entire Privacy Notice applies to you. However, please see the Section titled "Notice for Nevada Consumers" below, which will also apply to you.

## **Who We Are / Data Controller**

If you use our Site or purchase our Products, except as may be stated in this Privacy Notice, the **data controller** of your information is Eratronix, Inc., a California Corporation with the following contact information:

2075 N. Capitol Avenue, San Jose, CA 95132  
Tel: + 1 (408) 941-0808

## **What Personal Information Do We Collect and How Is It Collected?**

Depending on who you are and why you are using our Site, we collect different types of information.

"Personal Information" – or "Personal Data" as also used interchangeably throughout this Privacy Notice – means any information about an individual from which that person may be identified. For example, it may include your name, telephone number, email address, payment information, and IP address, device ID and location information. It does not include data from which the identity of an individual has been definitively removed along with any identifiers connected to such individual.

When you visit our Site or purchase our Products, we collect Personal Information directly from you when you provide it to us, as well as indirectly through automated technologies such as cookies.

### *Information Collected Directly*

#### *Account Registration Information*

We collect personal data that you voluntarily provide to us, such as when you register for an account on our Site. To do so, we may request certain Personal Information from you:

- your name
- your email
- your password
- your address
- your telephone number
- your company name (optional)



We also collect personal data you provide to us when you post a testimonial, feedback, review or comment including on our social media and blogs. This personal data may include your name and contact information, photos that you choose to upload and other personal data you may choose to provide as part of your post. We do not access photos on your device or cameras unless you allow us to do so. If you do allow us, you can manage your photos and camera settings at any time by changing the settings on your mobile device.

**Please note that personal data that you choose to post in a testimonial, feedback, review, or comment can be viewed, gathered, and utilized by the general public. Therefore, please exercise caution when posting information that you prefer to keep private or that others cannot access.**

### *Newsletter Subscription Information*

When you sign up, you may choose to opt in to receive Eratronix marketing emails. In addition, we may send you email updates from time to time. You may sign up for the Eratronix Email Newsletter, in which case we will collect:

- your name
- your email
- your general location information
- your company name (option)

If you do not wish to receive certain types of email communications, after logging in you may go to your **Account Settings** on the Site and click on **Change Email Preferences** to change your options, or you may unsubscribe using the link contained in the email.

### *Purchase order and transaction Information*

If you purchase any of our Products, we process information related to the Products that you purchase. This personal data may include biographical information, contact information, delivery information such as shipping address, telephone number, and payment and invoicing information, such as your bank account/card number, billing address, bank card expiration date, and bank card security code.

### *Correspondence*

We collect personal data through our interactions with you, whether you contact us or we contact you, and we will typically keep a record of such correspondence. This personal information could encompass details such as your name and contact information, account specifics, order history, inquiries, and any additional personal data that you decide to furnish.

### *Social Media Information*

Our presence extends to various social media platforms, which may include Facebook, Twitter, Instagram, YouTube and others. When you engage with us on social media, we collect personal information. It's important to be aware that these social media platforms may employ cookies and other tracking technologies on your device while you're on their pages or navigating away from them. They may share aggregated data from these interactions with us, typically for statistical analysis to better understand how users engage with our content on these platforms. Please keep in mind that these social



media platforms also act as data controllers for your personal information. Details regarding how they collect, utilize your personal data, and manage cookies and similar technologies, including guidelines on how to disable them, are typically outlined in their respective privacy policies and cookie policies available on their websites.

### *Information from Surveys and Contests/Sweepstakes*

We gather personal data when you participate in surveys designed for research purposes and when you decide to join contests or sweepstakes organized by us. This personal data may encompass details such as your name, contact information, and any additional personal data you opt to furnish us.

### *Credit and Anti-fraud Details*

We may gather personal information pertaining to your financial status, creditworthiness, or any information regarding criminal or fraudulent activities. This data may be provided by you directly or by third parties and may include identity-establishing information (like driver's licenses, passports, and utility bills), transaction-related information, credit scores obtained from credit bureaus, and reports on fraud, offenses, and questionable transactions in which your information is involved.

### *Information Collected Indirectly*

#### *Device and Usage Information*

When you visit, use, or interact with the Site, even if you do not have an account, we or our authorized third-party service providers collect information about your use of the Site via your device. Device and Usage Information that we collect consists of:

- **Information About your Device:** information about the devices and software you use to access the Site – primarily the internet browser or mobile device that you use, the website or source that linked or referred you to the Site, your IP address or device ID (or other persistent identifier that uniquely identifies your computer or mobile device on the Internet), the operating system of your computer or mobile device, device screen size, and other similar technical information.
- **Usage Information:** information about your interactions with the Site, including access dates and times, hardware and software information, device event information, crash data, cookie data. This information allows us to understand the screens that you view, how you've used the Site (which may include administrative and support communications with us or whether you have clicked on third-party links), and other actions on the Site. We, or our authorized third parties, automatically collect log data when you access and use the Site, even if you have not created an account or logged in. We use this information to administer and improve the Site, analyze trends, track users' use of the Site, and gather broad demographic information for aggregate use.

#### *Location Information*

We also collect your location information, including city, metro code, zip code, state, country, latitude and longitude, and area code through your IP address.



### *Cookies and Similar Technologies*

We or authorized third parties collect some information, including Device and Usage Information, by automated means using cookies, web beacons, and server logs for analytic purposes. For more information on our use of these technologies and the data that they collect, see our [Cookie Notice](#).

### *Analytics*

With the Device and Usage Information collected by our third-party analytics service providers, such as Google Analytics, we generate and process "Aggregated Information". This includes statistical or demographic data. Aggregated Information may be derived from personal data, but is not considered personal data under the law if it does not directly or indirectly reveal your identity. For example, we may track the total number of visitors to our Site or the number of visitors to each page of our Site, and we may aggregate usage data to calculate the percentage of users accessing a specific feature of the Site and analyze this data for trends and statistics.

However, if we combine or connect Aggregated Information with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data, which will be processed in accordance with this Privacy Notice. For more information on analytics, see our [Cookie Notice](#).

### *Information from*

In some instances, we process Personal Information from third parties, which primarily consists of:

- Data from our partners, such as Transaction Data from providers of payment service providers; and
- Data received from companies assisting us in delivering our services.

### *Why We Collect Your Personal Information and How We Use It*

Our mission is to provide safe, efficient, and high-quality Site, and we, or our authorized third-party service providers who assist us in providing the Site, process your Personal Information for this purpose. Personal Information is generally processed in order to:

- Provide you the Site and enable you to purchase and receive our Products;
- Ensure that our Site are operational and optimized for user experience, as well as to enforce our terms of use with you if necessary;
- Improve the content and general administration of the Site, as well as Products that we offer;
- Manage your account and subscriptions;
- Facilitating payments and managing the payment and refund processes for your convenience
- Oversee and handle these contests or sweepstakes, including the distribution of relevant prizes;
- Perform system maintenance and upgrades to enable your use of the website's interactive features;
- Communicate with you about updates to our terms, services and site and provide you with customer support by responding to your requests, questions, concerns and comments;
- Provide you with marketing materials with updates and offers regarding Products where you have chosen to receive these, such as through the Eratronix newsletter, email, social media, post, SMS and phone and fax;
- Enhance user experience, including to provide you with customer support;
- Detect fraud, illegal activities or security breaches;
- Respond to your queries and requests, or otherwise communicate directly with you;
- Conduct statistical analyses to facilitate the research and development purposes;
- Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice; and



- In the event of a business transfer (as further explained below).

For California residents, please visit this Section for more information on specific purposes of collection for each category of Personal Information collected in the past twelve (12) months.

For individuals located in the EEA, please visit this Section for more information on our legal bases for processing.

### *Children's Privacy*

The website is designed exclusively for adult use. Eratronix does not sell products intended for purchase by children and no personal data of children will be intentionally or knowingly collected. Products geared towards youth are intended for adult consumers only, so please use this website if you are 18 years or over.

If you choose not to provide the personal data outlined in our privacy policy, the following consequences may occur:

- We might not be able to furnish the requested products or services to you, and if we can, it may not meet the same standards or be available at all.
- We may be unable to send you information regarding products and services, including details about discounts, sales, or special promotions that you might be interested in.
- We may not be able to customize the content of our websites to your preferences, potentially affecting your overall experience, which may be less enjoyable or useful.

### *Managing Your Preferences*

#### *Accessing and Updating Your Personal Data*

If Personal Data about you changes, or if you no longer desire to use our Site, you may correct, update, amend, or deactivate your account under your account settings or by contacting Eratronix using the information set out in this Privacy Notice. We will respond to your request within a reasonable timeframe.

#### *Direct Marketing*

Eratronix enables you to manage your marketing preferences by clicking on the unsubscribe link contained in each electronic communication to you. Please use your preference settings to inform us of how you would like to receive marketing communications. Updates to your privacy preference information will be submitted once you have confirmed your changes.

You can also opt out of further direct marketing emails by clicking on the link at the end of each email message that you receive from us.

#### *Disclosure of Your Personal Information*

We disclose your Personal Information to the third parties indicated below:

- Companies that do things to help us provide the Site: hosting service providers, Product delivery services, user engagement and customer support providers, payment service providers, communication tools, and analytics tools;
- Professional service providers, such as auditors, lawyers, consultants, accountants, and insurers;



- Governments, regulators, law enforcement, and fraud prevention agencies, but only as authorized as explained here;
- Third-party organizations, in the event of a business transfer, sale, merger, or bankruptcy; and
- Third parties that may provide marketing to you that we believe may be of interest to you.

### **Third-Party Service Providers**

Eratronix may share users' information with our third-party agents, contractors, or service providers who are hired to perform services on Eratronix 's behalf. These providers may operate or support certain functions of the Site. Below is a list of categories of service providers that we may use to perform these functions (subject to change):

- Analytics services
- Customer support services
- Billing services and payment gateway providers
- Hosting and content delivery network services
- Product delivery partners.

### **Business Transfers**

As we continue to grow, we or our affiliates may purchase websites, applications, subsidiaries, other businesses or business units. Alternatively, we may sell businesses or business units, merge with other entities and/or sell assets or stock, in some cases as part of a reorganization or liquidation in bankruptcy. As part of these transactions, we or our affiliates may transfer your Personal Information to a successor entity upon a merger, consolidation, or other corporate reorganization in which Eratronix participates, or to a purchaser or acquirer of all or a portion of Eratronix 's assets, bankruptcy included.

### **Legal Obligations and Security**

Eratronix may preserve or disclose your Personal Information in limited circumstances (other than as set forth in this Privacy Notice), including: (i) with your consent; (ii) when we have a good faith belief it is required by law, such as pursuant to a subpoena, warrant or other judicial or administrative order (as further explained below); (iii) to protect the safety of any person; to protect the safety or security of our Site or to prevent spam, abuse, or other malicious activity of actors with respect to the Site; or (iv) to protect our rights or property or the rights or property of those who use the Site.

If we are required to disclose Personal Information by law, such as pursuant to a subpoena, warrant or other judicial or administrative order, our policy is to respond to requests that are properly issued by law enforcement within the United States or via mutual legal assistance mechanism (such as a treaty). Note that if we receive information that provides us with a good faith belief that there is an exigent emergency involving the danger of death or serious physical injury to a person, we may provide information to law enforcement trying to prevent or mitigate the danger (if we have it), to be determined on a case-by-case basis.

### ***Payment Processing***

We do not directly collect or hold any payment information and we do not store any payment information. We use third-party, PCI-compliant, payment processors, which collect payment information on our behalf in order to complete transactions. While we receive payment confirmations when a user makes a purchase, we do not have access to or process your credit card information. In some cases, payments may be made by check.





### *"Do Not Track"*

Eratronix will respond to Do Not Track ("DNT") signals. For more information on DNT settings generally, please visit <https://allaboutdnt.com>.

### *Protecting Your Personal Information*

No method of transmission over the Internet, or method of electronic storage, is 100% secure; however, we take steps that are reasonably necessary to securely provide our Site. We have put in place reasonably appropriate security measures designed to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. We limit access to Personal Data only to those employees, agents, contractors, and the third parties who have a business need-to-know.

We also have procedures in place to deal with any suspected data security breach. If required, we will notify you and any applicable regulator of a suspected data security breach. We also require those parties to whom we transfer your Personal Information to provide acceptable standards of security.

To maintain the confidentiality of your username and password, please refrain from sharing this information with anyone.

### *How Long Do We Keep Your Personal Information?*

#### *General Retention Periods*

We use the following criteria to determine our retention periods: the amount, nature, and sensitivity of your information, the reasons for which we collect and process your Personal Data, the length of time we have an ongoing relationship with you and provide you with access to our Site, and applicable legal requirements. We will retain Personal Information we collect from you where we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax or accounting requirements), when we are unable to reasonably verify your identity, or as may otherwise be required under GDPR. Additionally, we cannot delete information when it is needed for the establishment, exercise or defense of legal claims (also known as a "litigation hold"). In this case, the information must be retained as long as needed for exercising respective potential legal claims.

When we have no ongoing business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

If you have questions about, or need further information concerning, our data retention periods, please send an email to [privacynotice@eratronix.com](mailto:privacynotice@eratronix.com).

#### *Time Frame of Deletion*

If Personal Data can no longer be retained or is no longer necessary, it will be erased or anonymized/de-identified without undue delay.





### *Anonymization*

In some instances, we may choose to anonymize your Personal Data instead of deleting it, for statistical use, for instance. When we choose to anonymize, we make sure that there is no way that the Personal Data can be linked back to you or any specific user.

### *International Transfers*

We are located in the United States, and the Personal Information that we collect is stored on servers located in the United States. This means that your Personal Information will be collected, processed, and stored in the United States, which may have data protection laws that are different from (and sometimes less protective than) the laws of your country or region, such as the GDPR.

**By sending us Personal Information, you agree and consent to the processing of your Personal Information in the United States, which may not offer an equivalent level of protection to that required in other countries (particularly the European Union), and to the processing of that information by us on servers located in the United States, as described in this Privacy Notice.**

We have implemented safeguards designed to ensure that the Personal Information we process remains protected in accordance with this Privacy Notice, including when processed internationally or by our third-party service providers and partners. The safeguards we may take in our discretion include, for instance, entering into binding agreements in connection with any onward transfers of Personal Information. We may implement other mechanisms and take similar appropriate safeguards with our third-party service providers and partners. Further details can be provided upon request.

### *Changes to this Privacy Notice*

Eratronix may update this Privacy Notice from time to time, at its sole discretion. If so, we will post an updated Privacy Notice within the Site along with a change notice. Changes, modifications, additions, or deletions will be effective immediately on their posting to the Site. If we make significant changes, we may also send registered users a notice that this Privacy Notice has been changed. We encourage you to review this Privacy Notice regularly for any changes. Your continued use of the Site and/or your continued provision of Personal Information to us after the posting of such notice will be subject to the terms of the then-current Privacy Notice. If you continue to use the Site you will be deemed to have accepted the change.

### *How To Contact Us About Privacy*

If you have any questions regarding this Privacy Notice, please contact Eratronix at:

2075 N. Capitol Avenue, San Jose, CA 95132

Email: [privacynotice@eratronix.com](mailto:privacynotice@eratronix.com)

### **Notice for Nevada Consumers**

We do not sell your personal information within the scope of, and according to the defined meaning of a "sale" under, NRS 603A.



## *Additional Information for Individuals in the European Economic Area*

### **Categories of Recipients of Personal Data**

The categories of recipients of Personal Data with whom we may share your Personal Data are listed in Disclosure of Your Personal Information above.

### **Purpose of the Processing and Legal Bases**

Eratronix uses your Personal Information for a number of different purposes, as explained here. Some are essential for us to provide the Site you use or to fulfill our legal obligations, some help us run the Site efficiently and effectively, and some enable us to provide you with more relevant and personalized offers and information. In all cases, we must have a reason and a legal ground for processing your Personal Information. Some of the most common legal grounds we rely on are briefly explained below.

#### *Performance of a Contract*

We may process your Personal Data for the purposes of a contract to which you are a party, in other words, your ability to use the Site. For instance, if you purchase Products on the Site, we will process your data in order to carry out the purchase.

#### *Legitimate Interests*

We may process Personal Data where it is necessary for our legitimate business interests but only to the extent that they are not outweighed by your own interests or fundamental rights and freedoms. We generally rely on legitimate interests to provide and maintain Site that work well and securely, deliver marketing and advertising to you, carry out fraud prevention, and generally improve the Site. When we rely on this legal basis, if required, we'll carry out a legitimate interest assessment to ensure we consider and balance any potential impact on you (both positive and negative) and your rights under data protection laws.

#### *Consent*

Eratronix may rely on consent where it is required, such as with respect to Device and Usage Information collected via cookies and similar technologies (other than strictly functional cookies), or when we're asking you to confirm your marketing preferences. You have the right to withdraw your consent at any time if you no longer want Eratronix to process your Personal Data in connection with the activity for which your consent was sought.

#### *Legal Obligation*

Eratronix will, on occasion, be under a legal obligation to obtain and disclose your Personal Data. Where possible, we will notify you when processing your data due to a legal obligation, however, this may not always be possible. For instance, we may need to provide your data in order to prevent criminal activity or help to detect criminal activity, in which case we may share information with law enforcement.

The following table illustrates in more detail how the above legal bases for processing may apply to our primary purposes for processing different types of Personal Data:

General Purpose of Processing	Legal Basis	Type of Personal Data
<p>Provide you access to and use of the Site, including registering you for the Site and enabling the purchase of Products</p>	<p>Performance of a Contract Legitimate Interests</p>	<p>Account Registration Information Newsletter Subscription Information Device &amp; Usage Information Transaction Information Email Communications Location Information</p>
<p>Ensure that our Site are operational and optimized for user experience, as well as to enforce our terms of use with you if necessary</p>	<p>Legitimate Interests Performance of a Contract</p>	<p>Account Registration Information Device &amp; Usage Information Email Communications Location Information</p>
<p>Improve the content and general administration of the Site</p>	<p>Legitimate Interests</p>	<p>Account Registration Information Device &amp; Usage Information</p>



Enhance user experience, including to provide you with customer support	Legitimate Interests Performance of a Contract	Account Registration Information Device & Usage Information Newsletter Subscription Information Email Communications Transaction Information
To identify and follow up on business leads	Legitimate Interests	Account Registration Information Newsletter Subscription Information Device & Usage Information Email Communications
Detect fraud, illegal activities or security breaches	Legitimate Interests Performance of a Contract	Account Registration Information Device & Usage Information
Provide you with notices regarding Products that you have purchased or may wish to purchase in the future, such as through the Eratronix newsletter or in some cases via direct marketing communications	Performance of a Contract Legitimate Interests Consent	Account Registration Information Device & Usage Information Newsletter Subscription Information Email Communications



Respond to your queries and requests, or otherwise communicate directly with you	Performance of a Contract Legitimate Interests	Account Registration Information Email Communications
Perform system maintenance and upgrades, and enable new features	Legitimate Interests	Account Registration Information Newsletter Subscription Information Device & Usage Information
Conduct statistical analyses and perform analytics	Legitimate Interests	Account Registration Information Program Registration Information Device & Usage Information
Personalize and improve your experience with the Site and other Products provided by Eratronix, for example by providing customized, personalized, or localized content, recommendations and features based upon inferences drawn from your activity with or within the Site	Legitimate Interests	Account Registration Information Newsletter Subscription Information Device & Usage Information Transaction Information

Understand how you access and use the Site in order to provide technical functionality, develop new products and Site, and analyze your use of the Site	Legitimate Interests	Account Registration Information Newsletter Subscription Information Device & Usage Information Transaction Information
Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice	Compliance with legal obligations or Legitimate Interests	Only such information as may be required
In the event of a business transfer (as explained above)	Legitimate Interests	Only such information as may be necessary to effect the business transfer

### *Your Rights and Choices under GDPR*

**If the GDPR applies to you because you are in the EEA**, you have certain rights in relation to your Personal Data:

- The right to be informed – our obligation to inform you that we process your Personal Data (and that's what we're doing in this Privacy Notice).
- The right of access – your right to request a copy of the Personal Data we hold about you (also known as a 'data subject access request').
- The right to rectification – your right to request that we correct Personal Data about you if it is incomplete or inaccurate (though we generally recommend first making any changes in your Account Settings).
- The right to erasure (also known as the 'right to be forgotten') – under certain circumstances, you may ask us to delete the Personal Data we have about you (unless there's an overriding legal reason we need to keep it).
- The right to restrict processing – your right, under certain circumstances, to ask us to suspend our processing of your Personal Data.
- The right to data portability – your right to ask us for a copy of your Personal Data in a common format (for example, a .csv file).



- The right to object – your right to object to us processing your Personal Data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision-making and profiling – our obligation to be transparent about any profiling we do, or any automated decision-making.

These rights are subject to certain rules around when you can exercise them. If you are located in the EEA and wish to exercise any of the rights set out above, please contact us (see [How to Contact Us About Privacy](#)).

You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights) unless your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request under those circumstances.

We may need to request specific information from you to help us confirm your identity. This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. Note that if we are unable to reasonably confirm your identity, we will not be able to honor certain requests. We will respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated as required by law.

In addition, if you no longer wish to receive our marketing/promotional information, we remind you that you may withdraw your consent to direct marketing at any time directly from the unsubscribe link included in each electronic marketing message we send to you. If you do so, we will promptly update our databases and will take all reasonable steps to meet your request at the earliest possible opportunity, but we may continue to contact you to the extent necessary for the purposes of providing our Site.

Finally, you have the right to make a complaint at any time to the supervisory authority for data protection issues in your country of residence. We would, however, appreciate the chance to address your concerns before you approach the supervisory authority, so please contact us directly first.

#### *Additional Information for California Residents*

This Section ("CCPA Notice") supplements the information contained in this Privacy Notice and applies solely to all visitors, users, and others who reside in the State of California ("Consumers"). We have created this CCPA Notice in order to comply with the California Consumer Privacy Act of 2018 ("CCPA").

#### **Categories of Information We Collect**

Our Site collects Personal Information as that term is defined in CCPA: information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or device. In particular, within the last twelve (12) months, Eratronix has collected the following categories of Personal Information from Consumers:





Category	Examples	Collected
A. Identifiers.	A real name, unique personal identifier, online identifier, Internet Protocol address, email address, account name	YES
B. Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, address, telephone number, employment.	YES

<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<p>NO</p>
<p>D. Commercial information.</p>	<p>Records of products purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	<p>YES</p>

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, information on a Consumer's interaction with a website or application.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, visual information.	NO



I. Non-public education information (per the Family Educational Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
J. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated Consumer information.
- Certain other information that is already regulated by other laws or regulations.

As explained in more detail here, Eratronix obtains the categories of Personal Information listed above from the following categories of sources:

- *Directly from you.* For example, when you sign up to use the Site. This includes the following categories:
  - . Identifiers.
  - . Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).
    - D. Commercial information.
    - G. Geolocation data.
- *Indirectly.* For example, through the use of automated technologies or from third parties. This includes the following categories:
  - . Identifiers.
    - F. Internet or other similar network activity.
    - G. Geolocation data.



- J. Inferences drawn from other Personal Information.
- By observing Consumers' behavior through their purchases and activity on the Site. This includes the following categories:
  - . Identifiers.
  - . Personal Information categories listed in the California Customer Records Statute (Cal. Civ. Code § 1798.80(e)).
  - D. Commercial information.
  - F. Internet or other similar network activity.
  - G. Geolocation data.
  - J. Inferences drawn from other Personal Information.

**Use of Personal Information**

We may use, or disclose the Personal Information we collect for one or more of the following business purposes:

Categories of Information	Business Purpose
A. Identifier B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other Personal Information	Provide you the Site and enable you to purchase and receive our Products



<p>A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other Personal Information</p>	<p>To identify and follow up on business leads</p>
<p>A. Identifiers D. Commercial information F. Internet or other similar network activity G. Geolocation data</p>	<p>Ensure that our Site is operational and optimized for user experience, as well as to enforce our terms of use with you if necessary</p>
<p>F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other Personal Information</p>	<p>Improve the content and general administration of the Site</p>
<p>A. Identifiers D. Commercial information F. Internet or other similar network activity</p>	<p>Enhance user experience, including to provide you with customer support</p>



<p>A. Identifiers D. Commercial information F. Internet or other similar network activity G. Geolocation data</p>	<p>Detect fraud, illegal activities or security breaches</p>
<p>A. Identifiers D. Commercial information F. Internet or other similar network activity J. Inferences drawn from other Personal Information</p>	<p>Provide you with notices regarding Products that you have purchased or may wish to purchase in the future, such as through the Eratronix newsletter or in some cases via direct marketing communications</p>
<p>A. Identifiers B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) D. Commercial information</p>	<p>Respond to your queries and requests, or otherwise communicate directly with you</p>
<p>F. Internet or other similar network activity G. Geolocation data</p>	<p>Perform system maintenance and upgrades, and enable new features</p>
<p>A. Identifiers D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other Personal Information</p>	<p>Conduct statistical analyses</p>





A. Identifiers	Personalize and improve your experience with the Site and other
D. Commercial information F. Internet or other similar network activity G. Geolocation data J. Inferences drawn from other Personal Information	Site and products provided by Eratronix, for example by providing customized, personalized, or localized content, recommendations and features based upon inferences drawn from your activity with or within the Site
A. Identifiers D. Commercial information F. Internet or other similar network activity J. Inferences drawn from other Personal Information	Understand how you access and use the Site in order to provide technical functionality, develop new products and Site, and analyze your use of the Site, such as your interaction with applications, advertising, products, and Site that are made available, linked to, or offered through the Site
Any category of Personal Information as may be required and only as outlined in this Privacy Notice	Provide information to regulatory bodies when legally required, and only as outlined in this Privacy Notice
Only such information as may be necessary to effect the business transfer	In the event of a business transfer (as explained above)

Eratronix will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.



## Disclosure of Personal Information

Eratronix may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the services for us.

As explained in more detail above, we share your Personal Information with certain categories of third parties who assist us in providing our Site and Products.

### *Disclosures of Personal Information for a Business Purpose*

In the preceding twelve (12) months, Eratronix has disclosed the following categories of Personal Information for a business purpose:

- A. Identifier
- B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))
- D. Commercial information
- F. Internet or other similar network activity
- G. Geolocation data
- J. Inferences drawn from other Personal Information

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Companies that do things to help us provide the Site and our Products: hosting service providers, customer support providers, analytics tools, delivery partners.
- Professional service providers, such as auditors, lawyers, consultants, accountants, and insurers.

### *Sales of Personal Information*

Eratronix does not sell your Personal Information.

## Your Rights and Choices under CCPA

The CCPA provides Consumers with specific rights regarding their Personal Information, provided that we are able to verify their identities as explained here. This section describes your CCPA rights and explains how to exercise those rights.

### *Access to Specific Information and Data Portability Rights*

You have the right to request that Eratronix disclose certain information to you about our collection and use of your Personal Information over the past 12 months. Once we receive your request and **verify your identity** (see Exercising Your Rights), we will disclose to you:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting or selling that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).
- If we sold or disclosed your Personal Information for a business purpose, two separate lists disclosing:
  - sales, identifying the Personal Information categories that each category of recipient purchased; and



- disclosures for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

### *Deletion Request Rights*

You have the right to request that Eratronix delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive your request and **verify your identity** (see Exercising Your Rights), we will delete (and direct our service providers to 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 provider(s) for certain reasons as permitted and set forth in the CCPA. These reasons include (just to name a few):

1. Completing the transaction for which the personal information was collected.
2. Providing a good or service requested by you.
3. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible for such activities.
4. Debugging products to identify and repair errors that impair existing intended functionality.
5. Complying with a legal obligation.
6. Making other internal and lawful uses of that information that are compatible with the context in which you provided it.

### *Exercising Your Rights*

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.

An authorized agent is a natural person or a business entity registered with the Secretary of State that a Consumer has authorized to act on his or her behalf. When a Consumer uses an authorized agent to submit a request to know or a request to delete, Eratronix may require that the Consumer provide the authorized agent written permission to do so and verify their own identity directly with Eratronix, unless the Consumer has provided the authorized agent with a valid power of attorney. Eratronix may deny a request from an agent that does not submit proof that they have been authorized by the Consumer to act on his or her behalf.

To exercise the access, data portability, and deletion rights described above, please submit a verifiable Consumer request to us by either:

- Visiting [www.eratronix.com](http://www.eratronix.com)
- Emailing [privacynotice@eratronix.com](mailto:privacynotice@eratronix.com)

You may (or your authorized agent) only make a verifiable Consumer request for access or data portability twice within a 12-month period. The verifiable Consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- 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.** Making a verifiable Consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account as a reasonable step toward verification when the request relates to Personal Information associated with that specific account. Please note that the methods for verification are set forth in the CCPA, which also requires us to consider a number of factors, such as type, sensitivity and value of the Personal Information or risk of harm posed by unauthorized access or deletion, on a case-by-case basis.

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 forty-five (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.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable Consumer's request. If applicable, the response we provide will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable Consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

#### *Non-Discrimination*

We will not discriminate against you in a manner prohibited by the CCPA because you exercise your CCPA rights. Please note that to use our Site or purchase Products, we do require the collection of your Personal Information, for example, to sign up or in order to complete a paid transaction. While you may request to delete your Personal Information under CCPA, such deletions may affect Eratronix's ability to offer the Site and its Products.

#### *Questions About CCPA*

If you have any questions regarding this CCPA Notice, please contact Eratronix as follows:  
2075 N. Capitol Avenue, San Jose, CA 95132 E-Mail: need to be added for Eratronix