



## E Ink Website Privacy Policy

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### 1. OBJECTIVE AND SCOPE

The purpose of this privacy policy is to disclose to you what information we collect, how we collect it, with whom we share it, and certain other matters related to such information, including the choices you have regarding our collection of information and our use and disclosure to other parties of information we have collected from you ("**Privacy Policy**").

E Ink Holdings Inc., with its address at No.3, Lixing 1<sup>st</sup> Rd, Hsinchu Science Park, Hsinchu 300, Taiwan, ("**E Ink**", "**we**", "**our**", or "**us**") operates this site and other E Ink websites. Some of our affiliates and subsidiaries also operate public websites, such as a blog and certain social media sites. This Privacy Policy applies only with respect to information collected via the E Ink websites on which a direct hyperlink to this Privacy Policy is posted (individually and collectively the "**Site**"). Certain sections of this Privacy Policy only apply to the processing of personal data of Site visitors from the European Union ("**EU**"), as indicated below, or where applicable EU or EU Member State data protection laws so provide.

The Site is not directed at, and is not intended for minors and children under the age of 16 or otherwise defined by applicable law.

### 2. RESPONSIBILITY AND DATA CONTROLLER

E Ink operates the Site in the capacity of a controller with the following exceptions. The E Ink blog and social media sites (other than Weibo and WeChat, which are both operated by E Ink) are operated by E Ink Corporation, with an address at 1000 Technology Park Drive, Billerica, MA 01821, USA and for those sites references to "E Ink", "we", "our" or "us" in this Cookie Policy refer to E Ink Corporation.

Please read the information below to learn more about our data collection policies and practices.

We also use cookies and other tracking technologies. For more information about those please see our separate Cookie Policy [here](#).

### 3. UPDATES TO THIS PRIVACY POLICY

E Ink may amend this Privacy Policy at any time. If we make a material change to the way in which we process your personal data, we will post a notice on our website and / or send an email to users who have provided an email address for this purpose.

### 4. TYPES OF PERSONAL DATA THAT WE PROCESS

The following are the types of information we collect:

<b>Categories of Personal Data</b>	<b>Description</b>
<i>Information You Provide Us</i>	In the course of using the Site, we may ask you to provide us with certain information, including contact information (such as your name, mailing address, email address, phone number, or zip code and company name), unique identifiers (such as your user ID and password), demographic information, products you may be interested in or similar information you may disclose to us from time-to-time.
<i>Site Usage Information</i>	We receive and store certain types of data whenever you visit the Site. For example, we collect clickstream data, your IP address and information about your device.
<i>Email Communications</i>	We keep track of what emails we send you and what emails you may be receiving from us and our subsidiaries and affiliates. Additionally, we keep a record of what types of emails you have opted to and not to receive.
<i>Transaction Data</i>	Transaction data is collected when you purchase a product or service from us and includes order information, the goods or services that you order, general contact and shipping information as well as bank account details and other payment information necessary to carry out online/offline credit card transactions or payments using third-party payment systems.

### 5. SOURCES OF PERSONAL DATA

We collect information about or related to you from various sources:

<i>Registration</i>	You may be asked first to complete a registration form and provide personal data; you may also be asked to choose a user ID and password in order to take advantage of certain features the Site may choose to offer, including, but not limited to, newsletters, contests, forums, or other subscription-based services. Participation in registration is voluntary and you will have the opportunity to decide whether or not to disclose information to the Site.
<i>Newsletters and Site Emails</i>	We may offer free newsletters to share information with you about the Site, about us and our affiliates and subsidiaries, or about our business partners and advertisers and sponsors. You may receive a newsletter either by registering for a particular newsletter or in conjunction with a special feature or membership for which you have registered on the Site. You may cancel your free email subscription by following the instructions provided on the Site or, in some instances, in the designated area of certain newsletters or emails.

<i>Contests or Sweepstakes</i>	We may operate contests and sweepstakes through the Site which may require registration. Your personal data will be used to contact you for winner notification, prize delivery confirmation or other related purposes. We will ask your permission to allow us to post publicly some of your information on the Site and let you know if refusing this permission will disqualify you from entering into the contest or sweepstake.
<i>Surveys or Voting</i>	From time-to-time, we may request personal data from you via surveys or voting polls. Participation is voluntary and you will have the opportunity to decide whether or not to disclose information. At times, you may have to register to vote or to take part in a survey.
<i>Cookies and other tracking technologies</i>	We collect IP addresses and other information through cookies or other tracking technologies, as described in our separate Cookie Policy (see <a href="#">here</a> ).
<i>Transaction Information</i>	If you order any information from our Site, buy any of our products or subscribe for any of the services offered on our Site, we ask you to complete an order form that will request certain information from you, including general contact and shipping information. We use this information to complete the transaction that you have requested, i.e., to deliver the information, products or other services that you order. This information is collected and stored through encrypted means for your protection.
<i>Contact Forms</i>	The general or other contact forms available on our Site ask for information about you.
<i>Social Media Information</i>	We may receive information about you that you post or otherwise make directly available on independent social media sites and networks, including but not limited to Facebook, Twitter, YouTube, Pinterest, Weibo, and LinkedIn, where E Ink may have an official E Ink presence.
<i>Information from Our Service Providers</i>	We may receive information about you from our service providers, namely software and marketing service providers that help us manage our email communication with you.
<i>Information from Our Marketing Partners</i>	We may receive information about you from our marketing partners that help us manage our email communication with you.

## **6. WHAT WE USE THE PERSONAL DATA FOR AND LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA**

We process your personal data on the various legal bases of i) your consent or explicit consent, as the case may be, ii) fulfilling a contract with you, iii) meeting our legal or statutory obligations, iv) legitimate interests as outlined below, v) in order to protect the vital interests of you or other individuals, or vi) for the establishment, exercise or defense of a legal claim.

E Ink processes your personal data for the following purposes, namely:

<i>Confirming or fulfilling an order you have made</i>	<ul style="list-style-type: none"> <li>• Shipping the good to you or providing the service.</li> <li>• Invoicing.</li> </ul>
<i>Managing our relationship with you</i>	<ul style="list-style-type: none"> <li>• Establishing and verifying the identity and eligibility of users.</li> <li>• Providing company updates, and support.</li> <li>• Opening, maintaining, administering, managing, and servicing user profiles, accounts, and memberships.</li> <li>• Processing and responding to inquiries.</li> <li>• Operating and communicating with you about or through our official E Ink forums, and official social media accounts.</li> </ul>
<i>Managing the Site</i>	<ul style="list-style-type: none"> <li>• Managing or modifying any content that you choose to post or otherwise provide to us, whether through the Site, official E Ink forums, and official social media accounts, or other official E Ink means of interacting with us.</li> <li>• Ensuring that the Site is operating properly.</li> </ul>
<i>Improving Products and Services</i>	<ul style="list-style-type: none"> <li>• Analyzing our products and services.</li> <li>• Performing market research.</li> <li>• Performing data analytics.</li> <li>• Improving our products (related to electrophoretic displays and associated technology) and our Site (including developing new products and services) based on aggregate data.</li> </ul>
<i>Corporate Transactions</i>	<ul style="list-style-type: none"> <li>• As part of a merger, acquisition, bankruptcy, transfer, sale, corporate change, or any other transaction involving all or a portion of E Ink’s assets.</li> </ul>
<i>Direct marketing and events</i>	<ul style="list-style-type: none"> <li>• Conducting special events, sweepstakes, surveys, programs, contests.</li> <li>• Announcing/promoting the prizes that we award.</li> <li>• Providing other offers (and communicating with you about this) of our products or services (related to electrophoretic displays and associated technology and our Site), our affiliates’ or business partners’ products and services.</li> <li>• Personalizing the content of our offers to your preferences and interests.</li> </ul>
<i>Warranty, Product Repairs and Product Liability</i>	<ul style="list-style-type: none"> <li>• Addressing any warranty and guarantee questions and claims.</li> <li>• Tracking any quality and service issues.</li> <li>• Defending and protecting our interests or those of our affiliates and subsidiaries or business partners or other individuals such as our employees in case of a dispute or legal claim.</li> </ul>
<i>Network and Information Security; Technical Support</i>	<ul style="list-style-type: none"> <li>• Ensuring network and information security.</li> <li>• Providing technical support for the Site.</li> <li>• Maintaining the security and integrity of the Site and our systems.</li> <li>• Detecting and preventing security and other incidents related to this</li> </ul>

	<p>Site.</p> <ul style="list-style-type: none"> <li>• Maintaining internal records about relevant incidents and other security related information.</li> </ul>
<i>Regulatory Requirements</i>	<ul style="list-style-type: none"> <li>• Conforming to legal requirements and industry standards, complying with legal process, detecting and preventing fraud and misuse, defending our legal rights, and protecting others.</li> </ul>

## 7. WITH WHOM WE SHARE THE PERSONAL DATA

At times, we share your personal information with others for the purposes set out in Section 6 of this Privacy Policy or as specified below.

*Service Providers:* We employ other businesses, certain services and individuals to perform functions on our behalf. Examples include webhosting, fulfilling orders, sending e-mail, removing repetitive information from customer lists, Site analysis, analyzing data, providing marketing assistance, and providing customer service. These entities have access to personal data needed to perform their functions, but may not use it for their own or other purposes.

*Marketing Partners:* When you provide us with personal data, you may be presented with the opportunity to share your personal information with third parties for various purposes, such as receiving information or special offers. An opt-in/opt-out message will ask you if you would like your information to be shared. When you allow us to share your personal information with such third parties, we require third parties who have access to that information to agree to abide by our current Privacy Policy. Once the information is transferred, however, we cannot control the privacy practices of these other companies.

Our Website uses the AddThis sharebar provided by Oracle which uses your personal data to enable Oracle customers and partners to market products and services to you and to provide personalized recommendations and messages, to link browsers and apps across devices, to sync unique identifiers with Oracle's partners and to develop and improve Oracle products and services and for Oracle security and compliance purposes. For further details, see Oracle's AddThis Privacy Policy here: <https://www.addthis.com/privacy/privacy-policy/>.

*Social Media:* Our Site may embed plugs-ins, widgets or other apps of various social media platforms, such as Facebook, Twitter, LinkedIn, Pinterest, Instagram, and YouTube. An example of such a plug-in is Facebook's "Like" button. When you encounter those embedded objects, your internet browser may make a direct connection to the social media platform's service and may share with the social media platforms information such as which of our websites you have visited. Please carefully review the privacy policies and terms of use of those social media providers, which set out how they use your personal data.

*Subsidiaries and Affiliates:* We may share your information (including, without limitation, personal data) with our subsidiaries and affiliates. If you do not want us to share your information with our subsidiaries and affiliates, you may tell us by sending an email to [affiliates@eink.com](mailto:affiliates@eink.com) with your request (please write "Affiliates" in the subject line of your email).

*Parties to a Transaction:* In the event that all or substantially all of our assets are sold or transferred to another party, or another transaction occurs in which your personal information is one of the business assets transferred, all personal information that has been collected and saved may be one of the business assets we transfer in accordance with applicable laws.

*Participants in Legal Process:* In the event we are required to respond to subpoenas, court orders or other legal process or to defend our property, rights or the safety of our employees or others, your personal data may be disclosed pursuant to such subpoena, court order or legal process, including to other parties of the proceedings, adverse parties, external counsel, tribunals and courts, which may be without notice to you.

*Public:* We may share on social media or otherwise publicly announce prize winners.

Our operations, including our operating subsidiaries and affiliates as described above, are located in countries outside the EU, such as China, Taiwan, South Korea, Japan and the U.S. Likewise, some of the third parties with whom we share personal data are also located outside the EU in third countries which have not been officially recognized by the EU as providing an adequate level of data protection.

If the recipients of personal data are not located in a country, which has been officially recognized as adequate under EU data protection law, we rely on safeguards to protect your personal data such as the EU- U.S. Privacy Shield for transfers to self-certified US organizations (see here), the EU Standard Contractual Clauses (see here), Binding Corporate Rules (see here), approved Codes of Conduct and Certifications or in exceptional circumstances on permissible statutory derogations.

Please contact us using the contact details listed below, if you want to receive further information or, where available, a summary copy of the relevant safeguards.

## **8. LENGTH OF TIME WE KEEP YOUR PERSONAL DATA**

We keep your personal data, in accordance with our internal retention guidelines, for the time reasonably necessary for the purpose(s) outlined in this Privacy Policy for which they were collected unless a longer retention period is required or permitted by applicable laws. Please contact us using the contact details listed below, if you would like to know more about the criteria we use to determine the relevant retention periods.

## **9. YOUR CALIFORNIA PRIVACY RIGHTS**

Under California's "Shine the Light" law, California residents may request certain information regarding the types of information shared by us with other companies for those companies' direct marketing purposes. As explained in this Privacy Policy, whenever you agree to let us collect personal data, we will always provide you with an option to prevent this information from being shared for non-administrative purposes with third parties. You can exercise this option at any time by following the steps outlined above. Additionally, you can make a request for the information described above by following the directions provided below:

If you are a California resident and would like to make such a request, please send an email to [CAPrivacyRights@eink.com](mailto:CAPrivacyRights@eink.com) or write to us at E Ink Holdings Inc., No.3, Lixing 1<sup>st</sup> Rd, Hsinchu Science Park, Hsinchu 300, Taiwan, Attn: Website Privacy Policy/CA Privacy Rights.

## **10. PERSONAL DATA RIGHTS UNDER EU DATA PROTECTION LAW**

If you reside in the EU, EU data protection law, in particular the General Data Protection Regulation, affords you particular rights. Under the conditions and subject to the exceptions set by EU data protection law, you may exercise the following rights:

<i>Access</i>	You have the right to obtain from us confirmation if your personal data are being processed, relevant information about such processing as provided by applicable EU data protection law, and a copy of the personal data undergoing processing.
<i>Rectification</i>	You have the right to obtain from us the rectification of inaccurate personal data concerning you and to have incomplete personal data completed.
<i>Objection</i>	<p>You have the right to object to the processing of your personal data on grounds relating to your particular situation.</p> <p>You can also object at any time to the processing of your personal data for marketing purposes. (Please note that even if you object to our use of personal data for direct marketing purposes, we will still send you transactional messages in relation to goods or services that you have purchased from us. These include responses to your questions and information about a good or service you have purchased from us.)</p>
<i>Portability</i>	You have the right to receive the personal data concerning you which you have provided to the controller in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller.
<i>Restriction</i>	You may request to restrict processing of your personal data.
<i>Erasure</i>	You may request to erase (delete) your personal data.
<i>Right to lodge a complaint</i>	You have the right to lodge a complaint with a supervisory authority, in particular in EU Member State of your residence, place of employment, or the location where the issue that is the subject of the complaint occurred.
<i>Right to refuse or withdraw consent</i>	You are free to refuse to give consent and you can withdraw (with effect for the future) your previously provided consent to the processing at any time without any adverse consequences. The lawfulness of any processing of your personal data that occurred prior to the withdrawal of your consent will not be affected.

## 11. CONTACT US

If you wish to exercise any of the afore-mentioned rights or if you have any questions regarding this Privacy Policy, the roles and responsibility of E Ink or any of its subsidiaries and affiliates, where they act as joint controllers including their contractual arrangement, or complaints, please direct your request to:

Address: E Ink Holdings Inc.  
No.3 Lixing 1st Rd.  
Hsinchu Science Park  
Hsinchu 300  
Taiwan

For the E Ink blog and social media sites (other than Weibo and WeChat):

E Ink Corporation

1000 Technology Park Drive  
Billerica, MA 01821  
USA

Email: [compliance@eink.com](mailto:compliance@eink.com)

Only for South Korea: Johnson Lee  
Chief Privacy Officer  
E Ink Holdings Inc.  
No.3 Lixing 1st Rd.  
Hsinchu Science Park  
Hsinchu 300  
Taiwan

## 12. GLOSSARY

The following terms are used within this Privacy Policy and are defined here for clarification:

**“controller”** means the natural or legal person, public authority, agency or any other body which alone or jointly with others determines the purposes and means of the processing of personal data; where the purposes and means of processing are determined by the relevant regulations and laws of that jurisdiction;

**“data subject”** is an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

**“personal data”** means any information relating to a data subject;

**“processing”** means any operation or set of operations performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction;

**“processor”** shall mean a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the data controller.