E Ink Website Privacy Policy

Last Update: 03 August 2020

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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 1st 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 collection of personal information of Site visitors who are residents of the State of California as indicated below.

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

E Ink operates the Site 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 Privacy Policy refer to E Ink Corporation. The website of www.linfinity.co.jp is operated by Linfinity Japan Inc., with an address at Sony Akihabara Bldg., 1-24-2 Taito, Taito-ku, Tokyo, 110-0016 Japan and for the site references to “E Ink”, “we”, “our” or “us” in this Privacy Policy refer to Linfinity Japan Inc.
Please read the information below to learn more about our personal information 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 collect or share your personal information, 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 INFORMATION THAT WE COLLECT

The following are the types of information we collect:

<table>
<thead>
<tr>
<th>Categories of Personal Information</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Information You Provide Us / Identifiers</td>
<td>In the course of using the Site, we may ask you to provide us with certain information, including identifying 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.</td>
</tr>
<tr>
<td>Site Usage Information</td>
<td>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.</td>
</tr>
<tr>
<td>Email Communications</td>
<td>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.</td>
</tr>
<tr>
<td>Transaction Data</td>
<td>Transaction data is collected when you purchase a product or service from us and includes order form 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.</td>
</tr>
</tbody>
</table>

5. SOURCES OF PERSONAL INFORMATION

We collect information about or related to you from various sources:
| **Registration** | You may be asked first to complete a registration form and provide personal information; 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. |
| **Newsletters and Site Emails** | 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. |
| **Contests or Sweepstakes** | We may operate contests and sweepstakes through the Site which may require registration. Your personal information 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. |
| **Surveys or Voting** | From time-to-time, we may request personal information 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. |
| **Cookies and other tracking technologies** | We collect IP addresses and other information through cookies or other tracking technologies, as described in our separate Cookie Policy (see here). |
| **Transaction Information** | 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. |
| **Contact Forms** | The general or other contact forms available on our Site ask for information about you. |
| **Social Media Information** | 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. |
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.

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 INFORMATION FOR AND LEGAL BASIS FOR COLLECTING YOUR PERSONAL INFORMATION

We collect your personal information 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 collects your personal information for the following purposes, namely:

| Confirming or fulfilling an order you have made | • Shipping the good to you or providing the service.  
| • Invoicing. |
| Managing our relationship with you | • Establishing and verifying the identity and eligibility of users.  
| • Providing company updates, and support.  
| • Opening, maintaining, administering, managing, and servicing user profiles, accounts, and memberships.  
| • Processing and responding to inquiries.  
| • Operating and communicating with you about or through our official E Ink forums, and official social media accounts. |
| Managing the Site | • 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.  
| • Ensuring that the Site is operating properly. |
| Improving Products and Services | • Analyzing our products and services.  
| • Performing market research.  
| • Performing data analytics.  
| • Improving our products (related to electrophoretic displays and associated technology) and our Site (including developing new products and services) based on aggregate data. |
### Corporate Transactions
- 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.

### Direct marketing and events
- Conducting special events, sweepstakes, surveys, programs, contests.
- Announcing/promoting the prizes that we award.
- 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.
- Personalizing the content of our offers to your preferences and interests.

### Warranty, Product Repairs and Product Liability
- Addressing any warranty and guarantee questions and claims.
- Tracking any quality and service issues.
- 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.

### Network and Information Security; Technical Support
- Ensuring network and information security.
- Providing technical support for the Site.
- Maintaining the security and integrity of the Site and our systems.
- Detecting and preventing security and other incidents related to this Site.
- Maintaining internal records about relevant incidents and other security related information.

### Regulatory Requirements
- Conforming to legal requirements and industry standards, complying with legal process, detecting and preventing fraud and misuse, defending our legal rights, and protecting others.

## 7. WITH WHOM WE SHARE THE PERSONAL INFORMATION

We do not sell your personal information. However, at times, we may 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 information needed to perform their functions, but may not use it for their own or other purposes.

**Marketing Partners:** When you provide us with personal information, 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 information 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 information.

**Subsidiaries and Affiliates:** We may share your information (including, without limitation, personal information) 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 compliance@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 information 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 such as China, Taiwan, South Korea, Japan and the U.S. It is important to note that some of the third parties with whom we share personal information are located countries which may not provide the same protection as your country of residence.

If the recipients of personal information 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 information such as the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications or in exceptional circumstances on permissible statutory derogations.
8. LENGTH OF TIME WE KEEP YOUR PERSONAL INFORMATION

We keep your personal information, 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

If you reside in the State of California, various California privacy laws afford you particular rights. Under California Civil Code Section 1798.83, the “Shine the Light” law, users of our website that are California residents may request certain information regarding the types of information shared by us with other companies for those companies’ direct marketing purposes. If you are a California resident, you can make a request for the information described above by emailing compliance@eink.com or by mail sent to the address below.

• PERSONAL INFORMATION RIGHTS UNDER THE CALIFORNIA CONSUMER PRIVACY ACT

The California Consumer Protection Act (“CCPA”), provides Consumers (defined below) with specific rights regarding their personal information. This subsection describes your CCPA rights and explains how to exercise those rights. This subsection only applies to solely to all visitors, users, and others who reside in the State of California (“Consumers”). This subsection does not apply to E Ink employees whose information is collected by E Ink for employment purposes.

Consumers have the following rights under the CCPA:
| **Access and Portability** | After submitting a confirmed and verified request, Consumers have the right to obtain from us the categories of personal information we collected from you, the categories of sources for the personal information we collected from you, our business or commercial purpose for collecting the information, the categories of third parties with whom we share your personal information, and 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, we will provide two separate lists disclosing: sales (identifying the personal information categories that each category of recipient purchased) and disclosures for business purposes (identifying the personal information categories that each category of recipient obtained). For a list of the kinds of personal information we may collect, the sources of this information, and the purpose for collecting the information, please see Sections 4, 5, and 6 of this Privacy Policy. |
|**Deletion** | You may request that we erase (delete) your personal information, subject to certain exceptions. Once we receive and confirm a verifiable request we will delete (and direct our service providers to delete) your personal information from our records unless we must keep the data in order to: complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you; detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities; debug products to identify and repair errors that impair existing intended functionality; exercise free speech, ensure the right of another to exercise their free speech rights, or exercise another right provided for by law; comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. Seq.); engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information’s deletion may likely render impossible or seriously impair the research’s achievement, if you previously provided informed consent; enable solely internal uses that are reasonably aligned with Consumer expectations based on their relationship with us; comply with a legal obligation; or make other internal and lawful uses of that information that are compatible with the context in which you provide it. |
|**Personal Information Sales Opt-Out and Opt-In Rights** | While California residents have the right to opt-out of the sale of their personal information under the CCPA, we do not sell personal information to any third parties, and therefore, we have not included a “Do Not Sell My Personal Information” link on the Site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law. Additionally, we do not intend to market to any individual under the age of 18, and we expressly prohibit anyone under the age of 16 from disclosing or submitting any personal information to us throughout the Site or other means. Therefore, we do not sell any information of any individual under the age of 18. |
|**Right of Non-Discrimination** | We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:  
- Deny you goods or services;  
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;  
- Provide you a different level or quality of goods or services; or  
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services. |
These rights do not apply to E Ink employee or employment candidate information that is collected in the course of the employment or application for employment.

10. CONTACT US, EXERCISING YOUR RIGHTS

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

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