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1. Akamai Group and Contact Details

Akamai Technologies, Inc. and its wholly owned and operated global affiliates (each separately and together “Akamai”) respect your privacy and are committed to compliance with applicable privacy laws, regulations, and principles.

The entity controlling your personal data is the entity with which you interact. In case of interaction with Akamai websites, the controlling entity is Akamai Technologies, Inc.

1.1 Akamai’s Affiliates

A detailed list, with locations, of Akamai’s affiliates and contact details is available here.

1.2 Akamai’s Main EU Establishment and Supervisory Authority

Akamai’s main EU establishment:
Akamai Technologies GmbH
Attn: Global Data Protection Office
Parkring 22
85748 Garching
Germany

Akamai’s Supervisory Authority in the European Union:
Bayerisches Landesamt für Datenschutzaufsicht (BayLDA)
Promenade 18
91522 Ansbach
Germany

1.3 Akamai’s Data Protection Officers

<table>
<thead>
<tr>
<th>Chief Privacy Officer</th>
<th>EMEA Data Protection Officer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Address:</td>
</tr>
<tr>
<td>Akamai Technologies, Inc.</td>
<td>Akamai Technologies GmbH</td>
</tr>
<tr>
<td>Attn: Chief Privacy Officer</td>
<td>Attn: EMEA Data Protection Officer</td>
</tr>
<tr>
<td>Legal Department</td>
<td>Parkring 22</td>
</tr>
<tr>
<td>145 Broadway</td>
<td>85748 Garching</td>
</tr>
<tr>
<td>Cambridge, MA 02142</td>
<td>Germany</td>
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<tr>
<td>U.S.A.</td>
<td></td>
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</tbody>
</table>
1.4 How to Contact Us
If you have a question about this statement or Akamai’s handling of your personal data, or if you wish to execute your data subject access rights or provide instructions regarding our use of your personal data as set forth in this Privacy Statement, you may contact us:

To opt out of marketing email communications:

● By contacting us via our Marketing Email Opt-out Form

To access and provide instruction regarding your personal data:

● By contacting us via our DSAR Form

For any other matters:

● By sending an email to privacy@akamai.com or

● By mailing us at the postal addresses indicated in section 1.3 above

2. Personal Data Collected and Processed by Akamai Directly and Indirectly

This Privacy Statement explains what personal data (otherwise known as personal information) Akamai collects or otherwise processes about you through our interactions with you. Such interactions may occur through your status as, among others, a representative of a customer or a prospective customer; a representative of a partner or third-party service provider; a visitor to our websites, communities, web properties, applications, or portals (“Sites”); a visitor to our offices; a job applicant, or as you otherwise engage with Akamai.

The data collected depends upon the nature of your direct interaction with Akamai, the products, services, and features you use (or that the company you represent uses), Sites you use, as well as any decisions you make about providing data, including decisions through privacy settings that you may set on your browser or device. You may also provide your data to Akamai indirectly through use of one of Akamai’s customers’ websites or applications or via Akamai’s third-party service providers.

When asked to provide personal data, you may decline — but depending on what that personal data is and the purpose for which it may be collected, your user experience; ability to obtain a product, service, or offer from us; ability to provide a product or service to us; job application submission; or any other engagement with Akamai may be impacted.

Personal data will be processed by Akamai manually or by electronic means.

In general, Akamai collects and processes personal data in connection with the following business operations or activities: Akamai Services provisioning, Marketing activities, Recruitment, Procurement activities, visiting Akamai Sites, visiting Akamai facilities, or if you otherwise directly or indirectly engage with Akamai or speak to one of our representatives. An overview of categories of personal data collected and processed by Akamai depending on the activities, type of interaction, and data subject is included with further descriptions in the table below.
<table>
<thead>
<tr>
<th>No.</th>
<th>Business Operations and Other Activities</th>
<th>Data Subject</th>
<th>Category of Personal Data Collected and Processed</th>
<th>Type of Interaction Between Akamai and Data Subject</th>
</tr>
</thead>
</table>
| 1   | Akamai Services provisioning           | 1) Customer/prospective customer or their representative  
2) Partner/prospective partner or their representative  
3) End user accessing Akamai's customers’ websites or applications | Contact Information | Direct  
Indirect |
| 2   | Marketing activities                   | 1) Customer/prospective customer or their representative  
2) Partner/prospective partner or their representative  
3) Individual interested in Akamai services or products | Contact Information  
Device and Usage Data | Direct  
Indirect  
Direct |
| 3   | Recruitment                           | Job applicant | Employment, Job History, and Applicant Data | Direct  
Indirect |
| 4   | Procurement activities                | Service provider or its representative | Contact Information | Direct  
Indirect |
| 5   | Visiting Akamai Sites                 | Visitor to Akamai Sites/Interested individual | Akamai Sites Logs  
Device and Usage Data  
Login Information and Credentials  
Live Chat Data | Direct |
| 6   | Visiting Akamai facilities            | Visitor to Akamai facilities/Interested individual | Contact Information  
Office Visitors Data | Direct |
2.1 Akamai Services Provisioning

Akamai collects and processes personal data from you through your direct interactions with Akamai if you inquire about or obtain a service or product from us (or represent a company that inquires about or obtains a service or product from us). Categories of data collected and processed by Akamai may include the following:

- **Contact Information.** This data includes first and last name, email address, postal address, telephone number, company name, job title, and similar contact data.

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).

Akamai collects and processes personal data from you through your indirect interactions with Akamai as a result of providing Akamai services to our customers or partners, if you use one of Akamai's customers’ or partners’ websites or applications. Akamai acts mainly as a “processor” or “service provider” when processing such data (i.e. on behalf of our customers and subject to their instructions). For details of the data categories and processing activities relating to such data please read our data processing agreement, available in the Akamai Privacy Trust Center.

There are also scenarios where Akamai acts as “controller” and “processor” (accordingly “business” and “service provider”) with respect to data collected from the users of Akamai’s customers’ or partners’ website or applications. Categories of such data include the following:

- **Logged Personal Data.** Akamai collects network traffic data, including IP addresses and related internet transaction data that Akamai servers log as a result of the delivery of information over the Akamai platform, as well as (when our customer has purchased the relevant services) data associated with user activity and interaction with web and internet protocol sessions transiting Akamai’s servers as part of your session with the customer's websites and applications. Depending on the service type, Logged Personal Data include such data as end-user IP addresses, URLs of sites visited with time stamps (with an associated IP address), geographic location based upon IP address and location of Akamai server, and telemetry data (e.g., mouse clicks, movement rates, and related browser data).

Depending on the applicable laws, Logged Personal Data may or may not be classified as personal data. However, we do not process or maintain the information in an identifiable way.

We process the Logged Personal Data in a “controller” or “business” role (i.e., we process this data for our own purposes) when we use Logged Personal Data for purposes of traffic and security analytics, billing our customers, service improvement (e.g., improving Akamai’s threat intelligence) and aggregate reporting (i.e., reports that do not identify you or the customer). The details of the processing of Logged Personal Data in a “processor” or “service provider” role (i.e., we act on behalf of our customer) are outlined in our data processing agreement, available in our Privacy Trust Center.

For more information about processing of personal data in connection with Akamai Services and Akamai’s role as controller and processor please see Overview of Akamai’s Personal Data Processing Activities and Roles in connection with Services Provisioning and the information available in Akamai’s Privacy Trust Center.

2.2 Marketing Activities

Akamai collects and processes your personal data from you through your direct interactions with Akamai if you obtain a service or product from us (or represent a company that obtains a service or product from us), if you inquire about a service or product from us or you are otherwise interested in Akamai services, products, or events, or interact with Akamai Sites (e.g., by registering for Akamai newsletters or events, or accessing Akamai online resources) to perform direct marketing and lead generation activities. Categories of data collected and processed by Akamai in case of direct interaction include the following:
Contact Information. This data includes first and last name, email address, postal address, telephone number, company name, job title, and similar contact data.

Device and Usage Data. Akamai collects information about the device you use to access our Sites and the interactions of you and your device with our Sites. That personal data can include the internet protocol (IP) address associated with your computer or device, the domain name of your internet service provider (ISP), your device type and identifiers, browser type, operating system, the content or pages you view on the Akamai Sites, time spent on Akamai Sites, and similar usage and device information. Information is collected via different technologies used on Akamai Sites such as cookies, web beacons, Google Analytics, Adobe Analytics or third-party social media widgets. For more information about these technologies on Akamai Sites and your choices regarding them, see the Tracking Technologies section of this statement.

Akamai collects and processes personal data from you through your indirect interactions with Akamai as a result of service provisioning by third party service providers to Akamai. In some cases, you may provide such personal data via third-party service providers (e.g., professional event coordinators, lead generation service providers) who then forward the data to Akamai, typically pursuant to a contract with us. Such service providers perform business operations on Akamai’s behalf, such as sales, lead generation, and direct marketing. Akamai may also purchase data from contact database provider companies. Categories of data collected and processed by Akamai in case of indirect interaction include the following:

Contact Information. This data includes first and last name, email address, postal address, telephone number, company name, job title, and similar contact data.

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).

In marketing communication we use web beacon technology, as described in Web Beacons in Marketing Communication below.

As part of any marketing communications, we offer you the opportunity to choose to unsubscribe. You may at any time choose not to receive marketing communication from us by following the unsubscribe instructions included in each email you may receive, by indicating so when we call you, or via our Marketing Email Opt-out Form. Please note that if you choose to unsubscribe we will still keep your data on the marketing email opt-out list to make sure that you will not receive marketing communication from Akamai in the future. If you are a customer or partner, or a representative of a customer or of a partner who has an active account for our services, and you choose to unsubscribe, we will still send you non-marketing communications, e.g., your service-related notifications.

In addition to unsubscribe option, as indicated above, you may also at any time request deletion of your data by contacting us via our DSAR Form (see section Your Rights as Data Subject). Please note that if you choose to delete your data then your data will not be included on the marketing opt-out list. In case of deletion request we will not have records against which we can screen new data therefore you may receive marketing communication from Akamai in the future if we will have again legal basis for sending you marketing communication.

Akamai does not deliver third-party online advertisements on our websites, but we advertise our services on third-party websites. Please familiarize yourself with those website operators’ or network advertisers’ privacy policies to understand their practices relating to advertising, including what type of information they may collect about your internet usage. Some advertising networks we use may be members of the Network Advertising Initiative (NAI) or the European Interactive Digital Advertising Alliance (EDAA). Individuals may opt out of targeted advertising delivered by NAI or EDAA member ad networks by visiting the NAI website and Your Online Choices by EDAA.

These third-party websites may use cookies and web beacons to collect information (such as your IP address) about your activities on Akamai’s and others’ websites to provide you with targeted Akamai advertisements based upon your interests. If you wish to not have this information used for the purpose
of serving you targeted ads, you should update your preferences in the cookie management tool or contact the website owner. Please note that this does not opt you out of being served non-targeted advertising. You will continue to receive generic, non-targeted ads.

2.3 Recruitment
Akamai collects and processes personal data from you through direct interactions with Akamai if you apply for a job with us.
Akamai collects and processes personal data from you through indirect interactions with Akamai as a result of service provisioning by third-party service providers to Akamai. In some cases, you may provide such personal data via third-party service providers (e.g., job application sites, recruiter agencies) who then forward the data to Akamai, typically pursuant to a contract with us. Such service providers perform business operations on Akamai’s behalf, such as recruitment services or other Human Resources tasks.
Categories of data collected and processed by Akamai in case of direct and indirect interactions include the following:

- **Employment, Job History, and Applicant Data.** If you interact with Akamai to process employment applications, we collect personal identity and contact information, as well as data relating to your job history, educational history, resume, work eligibility, and related information used to evaluate candidates for employment with Akamai.

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).

Akamai uses automated tools provided by third parties to process your Employment, Job History, and Applicant Data collected both through direct and indirect interactions. These tools are used to organize your personal data, to support Akamai’s recruitment process (e.g., by offering nonbinding recommendations to Akamai during different stages of the process) and to ensure a fair and objective decision-making process by the Akamai Talent Acquisition team. Akamai does not make any decisions with legal or significant effects about you without meaningful human input.

If you wish to update your Employment, Job History, and Applicant Data processed by Akamai or withdraw your consent for participation in future recruitments, you may contact your recruiter directly or us as outlined in the How to Contact Us section of this statement.

2.4 Procurement Activities
Akamai collects and processes personal data from you through direct interactions with Akamai if you provide services or products to us (or represent a company that provides services or products to us) or if we inquire about a service or product from you (or from the company that you represent).

Akamai collects and processes your personal data through indirect interactions with Akamai if your representatives or agents (or representatives or agents of the company that you represent) offer your services or products to us or if we inquire about a service or product from your representatives or agents (or from representatives or agents of the company that you represent).

Categories of data collected and processed by Akamai in case of direct and indirect interactions include the following:

- **Contact Information.** This data includes first and last name, email address, postal address, telephone number, company name, job title, and similar contact data, as well as financial information (payment-related information).

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).
2.5 Visiting Akamai Sites

Akamai collects and processes personal data from you through direct interactions with Akamai if you use Akamai’s Sites (for example, when registering for an Akamai event, webcast, or training, or accessing resources such as publications and white papers available online), or use one of our mobile applications, or visit or interact with our Sites and services using technologies like cookies and methods for obtaining usage and device data. Categories of data collected and processed by Akamai include the following:

- **Akamai Sites Logs.** Akamai collects network traffic data, including IP addresses and related internet transaction data that Akamai servers log as a result of the delivery of information over the Akamai platform, as well as data associated with user activity and interaction with web and internet protocol sessions transiting Akamai’s servers as part of your session with Akamai web property. Akamai Sites Logs include such data as: end-user IP addresses, URLs of Sites visited with time stamps (with an associated IP address), geographic location based upon IP address and location of Akamai server, telemetry data (e.g., mouse clicks, movement rates, and related browser data). Depending on the applicable laws, logged data may or may not be classified as personal data. Except for Akamai portal logs we do not process or maintain the information in an identifiable way.

- **Device and Usage Data.** Akamai collects information about the device you use to access our Sites and the interactions of you and your device with our Sites. That personal data includes the internet protocol (IP) address associated with your computer or device, the domain name of your internet service provider (ISP), your device type and identifiers, browser type, operating system, the content or pages you view on the Akamai Sites, time spent on Akamai Sites, and similar usage and device information.

Akamai Sites Logs and Device and Usage Data are collected via different technologies used on Akamai Sites such as cookies, web beacons, Google Analytics, Adobe Analytics or third-party social media widgets. For more information about these technologies and your choices regarding them, see the Tracking Technologies section of this statement.

- **Login Information and Credentials.** If you use any of our Sites, you may be asked to create an account and provide a login name, password, and similar security information (e.g., a mobile phone number to which we can send a code) for authentication and account access.

- **Live Chat Data.** We also provide “live chat” sessions to assist you with our Sites and content. Please be aware that it is our general practice to monitor and record the live chat transcripts for staff training and quality assurance purposes, and in certain cases to retain evidence of a particular transaction or interaction. Live Chat Data includes content of the conversation and metadata about the user (e.g. IP address, type of connection (mobile, desktop etc.) and other web server metadata).

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).

To allow you to interact with other websites on which you may have accounts (such as Facebook and other social media service providers) or join communities on such sites, we provide links or embed third-party applications that allow you to log in, post content, or join communities from our Sites. We may also provide you with general links to third-party websites. Your use of these links and applications is subject to the third parties’ privacy policies, and you should become familiar with these third-party sites’ privacy policies before using the links or applications. Akamai is not responsible for the privacy practices or the content of those other third-party websites.

2.6 Visiting Akamai Facilities

Akamai collects and processes personal data from you through direct interactions with Akamai if you visit our offices or an Akamai trade show or exhibit booth. Categories of data collected and processed by Akamai include the following:
Contact Information. This data includes first and last name, email address, postal address, telephone number, company name, job title, and similar contact data.

Office Visitors Data. We collect CCTV images, first and last name, or other information when you enter our offices. We also collect details about your health if necessary, so that we can help you to access our buildings or reserve a parking spot.

Over this data, we are the “controller” or “business” (i.e., we determine the purpose and means of the data processing).

3. Purpose and Legal Basis for Processing of Personal Data

Akamai processes personal data to perform essential business operations and provide our products and services. In all cases, Akamai ensures that such processing is legal, fair, and reasonable. The various processing activities are justified by varying legal bases under the applicable data protection laws.

The specific purposes the data is used for varies by type of data and may include operating and maintaining our platform, improving performance, development of new features and capabilities, research, and customer support.

An overview of purposes of personal data processing by Akamai and corresponding legal bases is included in the table with further description on the following pages.

Table 2: Purpose and legal basis for processing

<table>
<thead>
<tr>
<th>Business Operations and Other Activities</th>
<th>Data Subject</th>
<th>Category of Personal Data Collected and Processed</th>
<th>Purpose of Processing</th>
<th>Legal Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Akamai Services provisioning</td>
<td>1) Customer/prospective customer or their representative</td>
<td>Contact Information</td>
<td>Communications, managing and supporting our customer relationship</td>
<td>Legitimate interest or Contract</td>
</tr>
<tr>
<td></td>
<td>2) Partner/prospective partner or their representative</td>
<td></td>
<td></td>
<td>Legitimate interest</td>
</tr>
<tr>
<td></td>
<td>3) End user accessing Akamai’s customers’ websites or applications</td>
<td>Logged Personal Data</td>
<td>Fulfillment of transactions/contractual obligations</td>
<td>Legitimate interest</td>
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<td></td>
<td>Providing support</td>
<td>Legitimate interest</td>
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<td></td>
<td>Product development and improvement</td>
<td>Legitimate interest</td>
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<tr>
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<td></td>
<td>Traffic and Security analytics</td>
<td>Legitimate interest</td>
</tr>
<tr>
<td>2</td>
<td>Marketing activities</td>
<td>1) Customer/prospective customer or their representative</td>
<td>Contact Information</td>
<td>Marketing communications and promotional events</td>
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<tr>
<td></td>
<td></td>
<td>2) Partner/prospective partner or their representative</td>
<td>Device and Usage Data</td>
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<td></td>
<td></td>
<td>3) Individual interested in Akamai services or products</td>
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<td></td>
</tr>
<tr>
<td>3</td>
<td>Recruitment</td>
<td>Job applicant</td>
<td>Employment, Job History, and Applicant Data</td>
<td>Recruitment</td>
</tr>
<tr>
<td>4</td>
<td>Procurement activities</td>
<td>Service provider or its representative</td>
<td>Contact Information</td>
<td>Communications, managing and supporting our vendor relationships</td>
</tr>
<tr>
<td>5</td>
<td>Visiting Akamai Sites</td>
<td>Visitor to Akamai Sites/Interested individual</td>
<td>Akamai Sites Logs Device and Usage Data</td>
<td>Providing functionality of our Sites</td>
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<td></td>
<td>Personalization of your experience on our Site</td>
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<td></td>
<td>Product development and improvement</td>
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<td>Marketing communications and promotional events</td>
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<td>Traffic and Security analytics</td>
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<td>Login Information and Credentials</td>
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<td>Providing mobile applications and social computing environments</td>
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<td>Providing support</td>
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<td>Live Chat Data</td>
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<tr>
<td>Visiting Akamai facilities</td>
<td>Visitor to Akamai facilities/Interested individual</td>
<td>Contact Information</td>
<td>Managing our relationship</td>
<td>Legitimate interest or Consent</td>
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</table>

The specific purposes mentioned above may include the following:

- **Communications, managing and supporting our customer relationships**: We use Contact Information collected about customers, prospective customers, partners, and prospective partners, and about individuals representing them, to manage and support our customer relationships. This includes providing support for our services, providing access to customer service portals and communities, providing service training, communicating with customers, selling new services and features, troubleshooting issues, and other customer relationship-related matters. Akamai has legitimate interest to manage the business relationship with you or the party that you represent, to respond to any request or inquiries you submit to us, or to submit communication or inquiries to you. If you are acting on your own behalf, Akamai is processing your Contact Information in order to take steps necessary, at your request, to enter into a contract and to perform that contract.

- **Communications, managing and supporting our vendor relationships**: We use Contact Information about our service providers or individuals representing our third-party service providers to manage and support our vendor relationships. This includes, among others, communication with vendors and third-party service providers, purchasing and negotiating new offerings, requesting support and maintenance services, completing necessary transactions, and fulfillment of contractual obligations. Akamai has legitimate interest to manage the business relationship with you or the party that you represent, to submit inquiries to you or to respond to any request or inquiries you submit to us. If you are acting on your own behalf, Akamai is processing your Contact Information in order to take steps necessary, at your request, to enter into a contract and to perform that contract.

- **Customer surveys and service improvements**: As part of our customer relationship, we may contact you as our customer or as a representative of a customer or a partner, if applicable (except if you chose not to be contacted by us) via Contact Information you provided, to ask whether you would like to participate in our satisfaction surveys or in market research surveys. We use these surveys to improve our service offering and business operations to better serve you and our customers and partners. Akamai has legitimate interest to maintain viable and efficient business operations through management and improvement of our services, increase customer satisfaction, provide better user experience, and identify ways to grow our business.

- **Fulfillment of transactions/contractual obligations**: We use Contact Information to respond to requests from current and prospective customers and partners or their representatives, and as needed and appropriate to complete business transactions, comply with contractual requirements, and provide Akamai services and products. If you are a representative of a customer or prospective customer, or a representative of a partner or prospective partner, Akamai has legitimate interest to process your Contact Information to manage the business relationship with you or the party that you represent. If you are acting on your own behalf, Akamai is processing your Contact Information in order to take steps necessary, at your request, to enter into a contract and to perform that contract. We use Logged Personal Data in order to comply with contractual requirements between Akamai and its customers. Logged Personal Data is processed for purposes of billing our customers based on Akamai's legitimate interest in providing and maintaining its products and services and calculation of fees.
AKAMAI PRIVACY STATEMENT

- **Managing our relationship:** We use Contact Information collected about visitors at our facilities (like Akamai offices, or trade show or exhibit booths) or about other interested individuals to manage our relationships. For example, we need your Contact Information to confirm your appointment at our offices or to handle your inquiries. Akamai has legitimate interest to manage the relationship with you and to respond to any request or inquiries you submit to us.

- **Marketing communications and promotional events:** We use Contact Information, Akamai Sites Logs, and Device and Usage Data we collect to communicate with you, whether you are a customer, prospective customer, or their representative, partner, prospective partner or their representative, visitor to Akamai Sites, or other individual interested in Akamai services and products. We use the personal data collected from your interaction with Akamai or with the Sites to deliver marketing communications, special offers, information about events, or advertisements that may be of interest to you or to parties that you represent, either directly or via third-party service providers.

Akamai has legitimate interest to process such data in order for us to operate effectively and to manage and respond to any request or inquiries you submit to us, allow interaction to provide information regarding Akamai products and services or events, and to promote our products, services, and events to identify ways to grow our business. Where legitimate interest may not serve as legal basis, Akamai is processing your data based on your consent, e.g., consent provided via subscription form on our Sites or via acceptance of cookies on our Sites, or consent provided to third parties who have shared your data for marketing purposes with us.

Some of our offerings may be co-branded, as they are sponsored by both Akamai and third parties. We share data with these third parties for promotional purposes (see section **Recipients of Personal Data**). Notwithstanding the above, Akamai and third parties are processing this data as separate controllers for their own purposes. We encourage you to familiarize yourself with such third parties’ privacy policies to gain an understanding of the manner in which they will handle personal data about you.

- **Office access and physical security:** We collect Office Visitors Data when you enter our facilities in order to enable you to access our offices and ensure physical security. Akamai has legitimate interest to protect the company’s facilities, its employees and visitors. In case of collection of sensitive data, such as health data to help you with access to our buildings, Akamai will seek your explicit consent.

- **Personalization of your experience on our Sites:** We use Akamai Sites Logs and Device and Usage Data to provide you with a personalized experience on our Sites, such as providing you with content in which you may be interested and making navigation on our Sites easier. The data also is used to generate statistics about the usage and effectiveness of our Sites and our service offerings, personalize your experience, and tailor our interactions with you. Akamai has legitimate interest to personalize our interactions to provide best experiences with our Sites and services as well as provide the content of the Sites that may be of interest to you. Where legitimate interest may not serve as legal basis, Akamai will seek your consent, e.g., use of cookies that are not strictly necessary.

- **Product development and improvement:** We use Logged Personal Data, Akamai Sites Logs and Device and Usage Data in the development of new products and services, to improve and implement new features and capabilities in existing products or to develop and improve our Sites. For example, Logged Personal Data and other traffic data is used to derive and compile information relating to the type, nature, content, identity, behavior, signature, source, frequency, reputation, and other characteristics of malicious internet traffic and activity and to create aggregate reporting (i.e. reports that do not identify you or the customer). Akamai has legitimate interest in developing and improving our products, services, platform, and Sites (e.g., routing optimization, service troubleshooting, identification and mitigation of security threats on the internet) to increase customers’ satisfaction and grow our business.

Last Updated: August 25, 2021
● Providing functionality of our Site: We use Login Information and Credentials, Akamai Sites Logs, and Device and Usage Data to provide you with services, features, or functionality of a website, community, or portal, as requested by you. Akamai is processing your data in order to take steps necessary, at your request, to enter into a contract and to perform that contract.

● Providing mobile applications and social computing environments: Akamai uses Login Information and Credentials in connection with offering mobile applications and social computing environments. Akamai makes available mobile applications for download from various mobile application marketplaces. Akamai also provides social computing tools on some of its Sites to enable online sharing and collaboration among members who have registered to use them. These include forums, wikis, blogs, and other social media platforms.

When downloading and using these applications or registering to use these social computing tools, you are asked to provide certain personal data. Akamai is processing your data in order to take steps necessary, at your request, to enter into a contract and to perform that contract or based on consent. Registration information will be subject to and protected in accordance with this statement, except for the personal data that is automatically made available to other participants in such a social computing environment as part of your profile or settings. The processing of your personal data by these applications and tools may be subject to their respective privacy statements with specific information about personal data collection and handling practices. We recommend that you read those statements to understand how the tools and applications are processing your personal data.

Any content you post, such as pictures, information, opinions, or any other type of personal data that you make available to other participants in such a social computing environment, is not subject to this Privacy Statement. Rather, such content is subject to the terms of use of the respective social computing environment, and any additional guidelines and privacy information provided in relation to its use, as well as the process by which you can remove your content from such tools or get help to do so. Please refer to the respective social computing environment to better understand yours, Akamai’s, and other parties’ rights and obligations with regard to such content. You should be aware that the content you post on any such social computing environments may be made broadly available to others inside and outside Akamai due to your profile and settings.

● Providing support: We use Contact Information to provide customers and partners with technical support as requested. We also use Akamai Sites Logs, Device and Usage Data, and Login Information and Credentials collected to troubleshoot and identify errors in our Sites as well as with our platform and services. Akamai has legitimate interest in maintaining viable and efficient business operations, services, products, platforms, and Sites. We use Live Chat Data to assist you with our Sites. In some cases we may use the live chat transcript for staff training and quality assurance purposes and in certain cases to retain evidence of a particular transaction or interaction. Akamai has legitimate interest in maintaining viable and efficient business communication.

● Recruitment: In connection with a job application or inquiry, whether advertised on Akamai Sites or on a third-party platform, you provide us (either directly or through a service provider like a recruiting agency or recruitment platform) with Employment, Job History, and Applicant Data about yourself. We may use this data within Akamai in order to address your inquiry, consider you for employment purposes, or collect your feedback. Depending on local regulations, our legal basis for processing of your personal data within our recruitment process is: taking steps necessary, at your request, to enter into an employment contract; our legitimate interest in managing the recruitment process effectively and attracting the best talent for our organization; or legal obligation to process certain information as part of recruitment process or your consent.

When you are providing more personal data than required for recruitment purposes in accordance with applicable laws, then please note that you are providing such data voluntarily,
and Akamai’s processing of such data is based on your consent, which is given through the voluntary submission of your data.

If your application is unsuccessful, Akamai may process your data for future recruitment processes based on your consent, or where applicable, our legitimate interest. When you show your general interest in working for Akamai or apply for future recruitment processes, then Akamai is processing your personal data based on your consent.

- Traffic and Security analytics: We use Logged Personal Data, Akamai Sites Logs, and Device and Usage Data to detect and prevent potential fraud and security risks to our platform and to our visitors, and to customers and their end users, for the purpose of related traffic and security analytics, as well as for managing access to our portal accounts for security purposes. For example, we might deny a particular IP address or set of IP addresses used to launch cyberattacks. Akamai has legitimate interest to protect the company’s networks, systems, and data as well as customers’ websites, applications, and end user’s data.

For detailed information related to purposes and legal basis to the extent we process the personal data as a “processor” or “service provider” (i.e., on behalf of our customer who is the owner of the respective website or application that you access or use), please contact Akamai’s customers or partners directly.

Additionally, we may use personal data listed in this statement to comply with our legal obligations, where applicable, or to resolve disputes and to protect or enforce our rights or claims. In case of any disputes, Akamai has legitimate interest in exercising or defending legal claims.

In all cases of data processing on the basis of our legitimate interests, Akamai considers the impact on the rights and freedoms of the individuals whose data may be part of the processing, and ensures that its processing activities do not contradict or place at unreasonable risk any such rights or freedoms.

4. Recipients of Personal Data

Akamai may share personal data about you as may be necessary to complete the purpose of data processing as defined above or to fulfill legal obligation as applicable. Personal data processed by Akamai will be shared, transferred, accessed, disclosed, and preserved by other authorized entities to the extent required:

- **Entities within Akamai group** — Akamai is a global organization with business processes, management structures, and technical systems that cover all Akamai affiliates. As such, we share the personal data within the Akamai group to support necessary business operations, e.g., providing global services, operating global programs and initiatives, recruitment and people management, maintaining viable and efficient business operations, or supporting necessary business functions (e.g., Human Resources, Finance, customer support services).

- **Third-party vendors, business partners, or agents** — Your personal data may be shared with third-party vendors providing services to Akamai, business partners, or agents working on our behalf for the purposes described in this statement. For example:
  - **Co-Branded Promotions** — We share some Contact Information and Device and Usage Data with our business partners in order to be able to offer you co-branded products and services that may be of interest to you
  - **Cloud Security Services** — We share Logged Personal Data in connection with detecting and preventing potential fraud and security risks to our platform and to our visitors and customers
  - **Protection of the Rights and Property of Akamai and Others** — We use and share the personal data you provide to protect the rights or property of Akamai, our business partners, third-party service providers, customers, or others when we have reasonable grounds to believe that such rights or property have been or could be affected

Last Updated: August 25, 2021
Corporate Transactions — Circumstances may arise where, whether for strategic or other business reasons, Akamai decides to sell, buy, merge, or otherwise reorganize businesses in one or more countries. In such cases, we may share the personal data collected within Akamai, with Akamai third-party service providers, or other third parties as reasonable to proceed with the negotiation or completion of a merger, acquisition, sale, or other corporate transaction.

Consultancy services — We also may share personal data with our advisors, auditors, and other third parties providing to Akamai consultancy services (e.g., tax, legal).

Sub-contracting services — We use subcontractors, e.g., for the purpose of Akamai services provisioning; a sub-processor list for Akamai Services is available in the Privacy Trust Center.

Third-party services — We may share Contact Information and Employment, Job History, and Applicant Data with Akamai third-party service providers, or other third parties as reasonable to operate and achieve the purpose of data processing as described in this statement.

Data processing policies and data transfer agreements govern the sharing of your data with the recipients. Recipients within Akamai groups as well as third-party vendors, business partners, or agents must e.g., abide by our data privacy, confidentiality, and security requirements, and are prohibited from using the data for any other purposes. In all cases, Akamai will seek reasonably appropriate protections for your personal data when sharing it with third parties, and we share it only if the recipient agrees to comply with this Privacy Statement or has in place substantially similar privacy policies regarding the treatment of personal data, and only after execution of a data protection agreement or a nondisclosure agreement.

National authorities — we use and share personal data as required to comply with applicable law or regulation, respond to proper law enforcement requests or other valid legal process, or to comply with applicable government reporting obligations (e.g., tax authorities, Social Security office).

5. International Transfer of Personal Data

Akamai is a global organization with business processes, management structures, and technical systems that operate globally. As such, we share the personal data within the Akamai group and with our business partners, third-party service providers and other third parties, consistent with this policy and as permitted by applicable law (see section Recipients of Personal Data), and therefore may transfer your personal data to other countries where we do business (see section Akamai’s Affiliates).

For any international transfer, Akamai shall ensure that such recipients maintain appropriate safeguards and shall have in place required data protection terms to ensure protection of personal data to the same degree as required by Akamai and applicable data protection laws. For any geography-specific transfer mechanism (e.g., transfer outside of European Economic Area, Argentina, Brazil) we have the required data transfer agreement in place. Please refer to the Data Transfer by Akamai section in the Akamai Privacy Trust Center for details.

6. Personal Data Safeguards

Akamai maintains administrative, technical, organizational, and physical measures designed — taking into account the nature of the data and the processing, the state of the art, the costs of implementation, and the potential for impact to the rights and freedoms of individuals whose data is being processed — to protect personal data in accordance with this statement and applicable laws against loss, and unauthorized access, use, alteration, and disclosure. Such measures include, by way of example, encryption in transit, two-factor authentication, and strict access controls. We also require that our
third-party service providers protect personal data against unauthorized access, use, alteration, and disclosure.

A detailed overview of the technical and organizational measures Akamai has in place to secure the personal data it processes when providing its services can be checked in the Akamai Privacy Trust Center. Overview of certifications and attestations maintained by Akamai can be checked under Akamai Compliance Portal.

7. Personal Data Retention

The retention of personal data collected depends on the purpose for which it has been collected and the systems used to process the data.

Table 3: Retention period

<table>
<thead>
<tr>
<th>No.</th>
<th>Business Operations and Other Activities</th>
<th>Data Subject</th>
<th>Category of Personal Data Collected and Processed</th>
<th>Retention Period</th>
</tr>
</thead>
</table>
| 1   | Akamai Services provisioning             | 1) Customer/prospective customer or their representative  
2) Partner/prospective partner or their representative  
3) End user accessing Akamai’s customer’s websites or applications | Contact Information  
Logged Personal Data | Data will be retained as long as required for the customer relationship. For security analytics data will be retained for up to 90 days in most of the cases. Where specific security events require updates of the existing algorithm, such data is retained for up to 180 days. For traffic analytics and for forensic data will be retained for up to 3 years. |
| 2   | Marketing activities                     | 1) Customer/prospective customer or their representative  
2) Partner/prospective partner or their representative  
3) Individual interested in Akamai services or products | Contact Information  
Device and Usage Data | Data will be retained until the purpose of processing is met. Data will be retained for 90 days. |
| 3   | Recruitment                              | Job applicant | Employment, Job History, and Applicant Data | Data will be retained for 2 years. |
| 4   | Procurement activities                   | Service provider or its representative | Contact Information | Data will be retained as long as required for the business relationship. |
### 5 Visiting Akamai Sites

<table>
<thead>
<tr>
<th>Visitor to Akamai Sites/Interested individual</th>
<th>Akamai Sites Logs</th>
<th>Data will be retained for 90 days. Akamai Control Center portal logs will be retained for 1 year in accordance with SOX and PCI requirements.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Device and Usage Data</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Login Information and Credentials</td>
<td>Data will be retained for as long as your account is active.</td>
</tr>
<tr>
<td></td>
<td>Live Chat Data</td>
<td>Data will be retained for 2 years.</td>
</tr>
</tbody>
</table>

Please note that, where applicable, we will retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, exercise or defend legal claims, or enforce our agreements.

### 6 Visiting Akamai facilities

| Visitor to Akamai facilities/Interested individual | Contact Information Office Visitors Data | Data will be retained for 90 days. In case of a security event, the data will be retained for as long as required by Akamai's legitimate interest to protect the company's facilities, its employees and visitors or in accordance with legal obligations (max. 180 days). |

Please note that, where applicable, we will retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, exercise or defend legal claims, or enforce our agreements.

### 8. Your Rights as Data Subject

Depending on your jurisdiction or on where you live, you may have the right to request access to and correction or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability or other rights as provided by applicable law. You also have the right to withdraw any consent that you may have given for the processing of personal data. You may have additional rights pursuant to your local law applicable to the processing. More information about your rights as a data subject can be found in the section Country-Specific Information.

You may make data subject requests by contacting us via our DSAR Form. Please note that before Akamai is able to provide you with any access to information, correct any inaccuracies, or delete your personal data, we will ask you to verify your identity and may seek other details from you to help us to respond to your request.

If we process your data indirectly as a result of providing Akamai services to our customers or partners (see section Akamai Services Provisioning) and you as end user accessing Akamai’s customers’ or partners’ websites or applications wish to exercise your data subject access rights, please contact directly the owner of the website or application who is the “controller” or “business” over your data, as we act only upon their instructions and cannot independently answer your request.
Note on Logged Personal Data and Akamai Sites Logs: As noted above, we do not, and are not required to, collect additional information in order to positively identify any individual. Therefore, absent detailed and verifiable proof that a given IP address from any person requesting access to Logged Personal Data or Akamai Sites Logs that may relate to them was actually assigned to the requestor during the time period of the request, we likely will not be able to provide any data in response to the request. If such verifiable and detailed information is available, Akamai will work with the requestor to determine if the request can reasonably be met.

9. Country-Specific Information

9.1 Information for Data Subjects in the EU

According to the GDPR, you have the right to:

1) access your personal data
2) rectify your personal data
3) erase your personal data
4) restrict processing of your personal data
5) object to processing of your personal data
6) transfer your personal data
7) withdraw your consent at any time where the legal basis of Akamai’s processing is based on your consent
8) lodge a complaint to the data protection authority or Akamai’s supervisory authority (find a list of EU data protection authorities here). The BayLDA, Akamai’s supervisory authority offers a website to report concerns here.

9.2 Information for California Residents

The personal data we collect about you includes information within the categories defined in the table below. The categories listed are defined by California law and are designed to represent the personal data that we may have collected about California residents, and how it may have been shared over the past 12 months, if at all. We do not necessarily collect all information listed in a particular category, nor do we collect all categories of information for all individuals. We do not sell, and do not intend to sell, personal information about you, as defined under California state law.
<table>
<thead>
<tr>
<th>Category</th>
<th>Sources</th>
<th>Purpose of Collecting Information</th>
<th>Disclosed for a Business Purpose?</th>
<th>Who Shared With?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Personal Identifiers</strong></td>
<td>direct from you, our customers, our service providers</td>
<td>A subset of this data is processed in connection with a number of our operational functions, including to provide products and services to our customers, provide customer support, and to fulfill transactions and contractual obligations. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and for data analytics. This information may also be used for marketing purposes, including offering you products that may interest you. For job applicants, a subset of this information is used to process your application.</td>
<td>Yes</td>
<td>affiliates, service providers, customers</td>
</tr>
</tbody>
</table>
**Information About You.**

Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

- directly from you
- our customers
- our service providers

A subset of this data is processed in connection with a number of our operational functions, including to provide products and services to our customers, provide customer support, fulfill transactions and contractual obligations. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.

This information may also be used for marketing purposes, including offering you products that may interest you.

For job applicants, a subset of this information is used to process your application, including to the extent we arrange travel for you to interview, or if we need to confirm right-to-work status.
**Demographic Information.**

Characteristics of classes protected under federal or state law, including: familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, age, or genetic information.

- directly from you
- our service providers
- public records

A subset of this data is processed in connection with our operational functions as permitted by law, including for example providing customer support and fulfilling legal and contractual obligations. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.

This information may also be used for marketing purposes, including offering you products that may interest you.

We may also process a subset of this information as part of an employment application, including to make any accommodations for interviewing and to make you aware of any benefits you may receive.

**Commercial Information.**

Including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- directly from you
- our customers

A subset of this data is processed in connection with a number of our operational functions, including to provide products and services to our customers, provide customer support, fulfill transactions and contractual obligations.

This information may also be used for marketing purposes, including offering you products that may interest you.
Usage Information. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer’s interaction with a website, application, or advertisement.

- directly from you
- our customers
- our service providers
- through the use of cookies and similar technologies

This data is processed in connection with a number of our operational functions, including to provide products and services to our customers, provide customer support, fulfill transactions and contractual obligations. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.

This information may also be used for marketing purposes, including offering you products that may interest you.

Geolocation Data.

- directly from you
- our customers
- our service providers
- through the use of cookies and similar technologies

This data is processed in connection with a number of our operational functions, including to provide products and services to our customers, provide customer support, fulfill transactions and contractual obligations. It is also processed to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for data analytics.

It is also processed for marketing purposes, including offering you products that may interest you through both direct and partner advertising.
### Sensory Information

Audio, electronic, visual, thermal, olfactory, or similar information.

- directly from you
- our service providers

This data is processed in connection with a number of our operational functions, including providing customer support (i.e., when you call into our call center, we may record the call, or, if you come into our offices to interview, you may be recorded by CCTV).

| Yes | affiliates | service providers |

### Professional or employment-related information

Such as your job title, job history, or income.

- directly from you
- our customers
- our service providers
- what you may post on social media and job sites

A subset of this data is processed in connection with a number of our operational functions, including to provide products and services to our customers, and for human resources purposes. It may also be used for marketing purposes, including offering you products that may interest you.

| Yes | affiliates | service providers |

### Inferences

Drawn from any of the above categories of information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

- our service providers

A subset of this data is processed in connection with a number of our operational functions, including to provide products and services to our customers, to detect security incidents, and protect against malicious, deceptive, fraudulent or illegal activity. It is also processed for marketing purposes, such as offering you products that may interest you.

| Yes | affiliates | service providers |

## Privacy Rights of California Residents

For residents of California, to the extent we have collected information about you on our behalf, you may have the rights regarding your personal information described below, subject to certain conditions and limitations:

1) **Right to Know** – You are entitled to request that we disclose to you personal information we have collected about you, the categories of sources from which we collected the information, the purposes of collecting the information, the categories of third parties with whom we have shared the information, and the categories of personal information that we have shared with third parties for a business purpose. In some instances, you have the right to receive the information about you in a...
portable and readily usable format. Before providing any of this information, we must be able to verify your identity.

2) **Right to Opt Out** – We currently do not sell personal information to third parties, nor do we intend to do so, and therefore we do not offer this option. However, we share personal information about you with our service providers and partners as permitted by law.

3) **Right to Deletion** – Subject to certain conditions, you are entitled to request that we delete personal information about you. Before deleting information, we must be able to verify your identity. We will not delete personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you while continuing to provide you with certain products and services or where we are legally required to retain certain information.

If you choose to exercise any of these rights, to the extent that they apply, state law prohibits us from discriminating against you on the basis of choosing to exercise your privacy rights.

**Submitting a Personal Information Request Under CCPA**

For residents of California, you may exercise your privacy rights under the California Consumer Privacy Act (“CCPA”) by submitting a personal data request via our DSAR Form or by calling this toll-free number, +1 877-425-2624, and selecting the “Other” option to speak to a member of our team.

Before providing information you request in accordance with these rights, we must be able to verify your identity. In order to verify your identity, we may request that you submit information about yourself, including, to the extent applicable, providing your account login credentials or other account information, answers to security questions, your name, government identification number, date of birth, contact information, or other personal identifying information. We will match any information against information we have previously collected about you to verify your identity and your request. To the extent you maintain an account with us, we may require you to log in to that account as part of submitting your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. Information collected for purposes of verifying your request will only be used for verification. If you would like to appoint an authorized agent to make a request on your behalf, and that agent is not already authorized to access your account in your profile, please submit a notarized special power of attorney, or a signed letter from an attorney representing you, identifying the agent and authorizing them to submit requests and receive information on your behalf. We may require you to verify your identity with us directly before we provide any requested information to your approved agent.

9.3 **Information for Data Subjects in Brazil**

According to the LGPD, you have the right to:

1) confirmation of the existence of the processing
2) access the data
3) correction of incomplete, inaccurate, or out-of-date data
4) anonymization, blocking, or elimination of data that is unnecessary, excessive, or processed in noncompliance with the provisions in the LGPD
5) data portability
6) deletion of personal data that is processed with the data subject’s consent on withdrawal of that consent
7) information about public and private entities with which the controller has shared data
8) information about the possibility of denying consent and the consequences of such denial
9) revocation of consent
10. Children and Minors

We do not knowingly collect personal data directly from children and minors (“children and minors” as defined under applicable law). Our services are not intended for children and minors and children and minors should not submit or post personal data through our services. We may collect personal data regarding children and minors from their parents or legal guardians, but only as necessary to provide our products and services to our customers and partners, however Akamai customers and partners remain responsible for personal data collection via their websites and applications and its compliance with applicable laws.

11. Tracking Technologies

11.1 Cookie Technologies

General Information

A cookie or similar tracking technology is injected into your browser to collect certain data related to the device used to access a website or application.

You can generally express your privacy preferences regarding the use of most cookies and similar technologies on our Site through the Akamai cookie management tool or your web browser settings. If you block, turn off, or otherwise reject cookies, some websites or applications may not display properly, or you will not be able to proceed using the website or application, to checkout, for instance.

Some Sites, service offerings, and services also use web beacons or other technologies to provide better customer service. These technologies may be in use on a number of pages across the Sites. When you as a visitor access these Sites, an unidentifiable notice of that visit is generated, which is processed by the site owner or by third-party service providers. These web beacons usually work in conjunction with cookies. If you don’t want your cookie information to be associated with your visits to these Sites or use of these services, you can control the web beacons via the Akamai cookie management tool or your browser settings. If you turn off cookies, web beacons and other technologies will still detect visits to these sites; however, they will not be associated with information otherwise stored in cookies.

Cookies on Akamai Sites

We collect information from your visits to our Sites in order to help us gather statistics about usage and effectiveness of our Sites, personalize your experience with our Sites, tailor our interactions with you, and provide, develop, and improve our services. We do so through the processing of transaction logs, as well as the use of various cookie technologies. We use session cookies, for example, for media performance analytics. We use persistent cookies, for example, to record your choice of language and country location. You can check the list of all cookie technologies used by Akamai Sites via the Akamai cookie management tool on the Sites.

While Akamai’s Sites at this time do not recognize automated browser signals regarding tracking mechanisms, such as “do not track” instructions, you can express your privacy preferences regarding the use of cookies and similar technologies (except for strictly necessary cookies) through the Akamai cookie management tool or your web browser settings. Please note that if you do this your user experience of our Sites may be reduced.

Third parties with whom we partner to provide certain features on our Sites or to display Akamai advertising on others’ websites based upon your web browsing activity also use Flash cookies or HTML5
to collect and store information. Various browsers may offer their own management tools for removing HTML5. To manage Flash cookies, please visit this page.

Some of our business partners set web beacons and cookies on Akamai’s Sites and mobile applications. You can also manage these third-party cookies through the Akamai cookie management tool or your web browser settings.

Cookies in Akamai Services

We collect information from your interactions with our customers’ service offerings, sites and applications, in order to help us to provide, develop and improve our services. Many Akamai services that you interact with via our customer services use session and persistent cookies in order to provide the service functionality. Examples of the purposes for use of various cookies include determining whether a given interaction is with a human or a “bot,” identifying attempts to bypass security settings, identifying devices that already have been authenticated, web performance analytics, media analytics, and similar necessary service functions. Such cookies are developed based on privacy by design principle, and do not identify individuals nor track them. For example, the domain go-mpulse.net or akstat.io used for web performance analytics does not collect, retain, or share any data regarding a particular user or device (including IP addresses and user identifiers) on sites or applications not owned by Akamai, nor does it identify nor track a particular user or device. You may refuse the use of cookies by selecting the appropriate settings on your browser or the cookie management tool offered by our customers, however please note that if you do this you may not be able to benefit fully from the capabilities of services or applications used by our customers.

Cookies used to provide Akamai security services are classified as strictly necessary cookies for the performance of the services you are requesting. To not undermine the purpose of the services, to protect the personal data submitted by you when using our customers’ web services and products, and to make the internet a safer place, we do not have to offer an opt-out mechanism for the security cookies. If we do, malicious actors would opt out and thereby prevent the detection of their malicious activities.

We offer cookie management options depending on our customers’ classification. Details are available in Akamai’s Community or via the responsible Akamai Sales Account representative.

Web Beacons in Marketing Communication

We include web beacons in marketing email messages or our newsletters in order to determine whether messages have been opened and links contained within have been clicked on.

11.2 Google Analytics

We use Google Analytics, a web analysis service of Google LLC, (1600 Amphitheatre Parkway, Mountain View, CA 94043, USA; “Google”), for our Sites. The use includes the “Universal Analytics” operating mode. This facilitates the assignment of data, sessions, and interactions across several devices to a pseudonymous user ID and thus the analysis of a user’s activities across devices. Google Analytics uses cookies. The information generated by the cookie about your use of the Sites is usually transferred to a Google server in the USA and stored there. In case you are an EU data subject, we configured Google Analytics to have Google shorten your IP address before it is transferred to Google servers in the USA. Only in exceptional cases will your complete IP address be transferred to the USA and shortened there. According to Google, the IP address transferred by your browser will not be merged with other data Google holds. On our behalf, Google will use your data for analytics relating to your use of the Site, to compile reports on Site activity, and to provide us with other services related to website and internet use.
For more information on Google Analytics, please see the Google Analytics Terms of Service and the Google Analytics Privacy Statement.

You may also prevent Google from collecting the data generated by the cookie and relating to your use of the Sites (including your IP address) and from processing this data by Google by downloading and installing the Google Analytics Opt Out Browser Add-on, available here. Opt-out cookies prevent the future collection of your data when you visit the Sites. To prevent Google Universal Analytics from collecting data across several devices, you must opt out on all systems used.

11.3 Adobe Analytics

We use Adobe Analytics, a web analysis service of Adobe Inc, (345 Park Avenue, San Jose, CA 95110, USA; “Adobe”), for our Sites. Adobe Analytics uses cookies which generate information about your use of our Sites. List of Adobe Analytic cookies used on our Sites can be checked in the Akamai cookie management tool. Adobe Analytics will collect the following data: IP address, usage information, location data. Data gathered in connection with the use of Adobe Analytics will be used by Akamai to perform analytics on our Sites to better understand how you use our Sites and optimize and adapt it to the needs of website visitors. Data will be collected via servers hosted in Amazon Web Services Inc.’s locations that are closest to the website visitor’s location and will be transferred and stored on Adobe servers in the USA.

For more information on how Adobe collects and uses information in connection with its services please see Adobe Privacy Policy in Adobe Privacy Center. You may opt-out of data collection and use by Adobe Analytics in connection with your use of the Sites via the Akamai cookie management tool or your browser settings.

11.4 Third-Party Social Media Widgets

In addition, third-party social media widgets (e.g., Facebook’s “Share” or “Like” button), the playing of videos embedded on our Sites and operated by third-party video-sharing providers (e.g., YouTube), and surveys linked to from our Sites and operated by third-party providers (e.g., SurveyMonkey), may log certain information such as your IP address, browser type and language, access time, and referring website addresses, and, if you are logged in to those social media sites, they may also link such collected information with profile information they may have about you. We do not control these third-party tracking technologies. Please make yourself familiar with the usage of these third-party web beacons and cookies, and read their privacy statements to understand their data collection practices and the choices offered to you (e.g., for YouTube).

Depending upon your privacy settings with the social media service providers, we may be able to collect information from your profile set up for their social media services when you interact with the widgets.

We may include applications (or “widgets”) from third-party social media offerings that allow you to follow or interact with us on social media platforms. These widgets, such as a Facebook “Share” or “Like” button, are visible to you on the Sites you visit. When you use these widgets or when you are logged in to those platforms, the respective social media providers may be able to collect information about your use of the Sites. Please view the applicable social media network’s privacy policy to better understand their data collection practices and choices they make available to you. The privacy policy of the social media network controls the collection, use, and disclosure of all personal information transmitted to that network.
12. Changes to Privacy Statement

12.1 Notification of Changes

Please note that applicable laws and business operations change, so we reserve the right to update this Privacy Statement at any time. If we are going to use your personal data in a manner different from that which is stated in this Privacy Statement at the time of collection, we will notify you, and you will have a choice as to whether or not we can use your personal data in such a way. We recommend that you check this Privacy Statement regularly to familiarize yourself with Akamai’s practices and to be aware of any material changes.

12.2 Change Control

<table>
<thead>
<tr>
<th>Date of change</th>
<th>Change description</th>
</tr>
</thead>
<tbody>
<tr>
<td>May 15, 2018</td>
<td>The Akamai Privacy Statement was updated to meet the requirements of the General Data Protection Regulation EU 2016/679 (“GDPR”). Added descriptions of privacy practices associated with data processed as part of Akamai service offerings.</td>
</tr>
<tr>
<td>January 1, 2020</td>
<td>The Akamai Privacy Statement was updated to meet the requirements of the California Consumer Privacy Act (“CCPA”). Added descriptions of privacy practices associated with data collected as part of Akamai service offerings.</td>
</tr>
<tr>
<td>July 1, 2020</td>
<td>The Akamai Privacy Statement was updated to meet cookie law requirements. Added clarification that cookies used by Akamai services do not track individuals.</td>
</tr>
<tr>
<td>December 23, 2020</td>
<td>The Akamai Privacy Statement was restructured to ensure more transparency for data subjects and updated to include recent changes to data protection requirements, e.g., international data transfer.</td>
</tr>
<tr>
<td>January 11, 2021</td>
<td>The Akamai Privacy Statement was updated to include changes resulting from Brexit. Main EU establishment and Supervisory Authority were changed to Germany.</td>
</tr>
<tr>
<td>April 6, 2021</td>
<td>The Akamai Privacy Statement was updated to include changes resulting from current processing practices, especially updates to legal bases for processing activities and retention periods.</td>
</tr>
<tr>
<td>August 25, 2021</td>
<td>The Akamai Privacy Statement was updated to include changes resulting from current processing practices, especially addition of new Adobe Analytics tool on Akamai website, distinction between opt out and deletion request, and to provide a comprehensive document describing Akamai’s processing activities as a controller.</td>
</tr>
</tbody>
</table>