

## Silicom Privacy Notice

We at Silicom Ltd. ("**Silicom**" "**us**", "**we**", or "**our**") recognize and respect the importance of maintaining the privacy of our customers. This Privacy Notice describes the types of information we collect from you when you visit our website ("**Site**"). This Privacy Notice also explains how we collect, process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. "**Terms**" means our Terms of Service, available at <https://www.silicom.dk/legal/>. "**You**" means any adult user of the Site or any parent or guardian of any minor whom you allow to use the Site, and for whom you will be held strictly responsible.

Silicom Ltd. is the data controller in respect of the processing activities outlined in this Privacy Notice. Our registered office is 14 Atir Yeda St. Kfar Sava 4464323 and Israel and our registration number is 520041120. Our co-controllers are listed below. Our representative in the European Union is Silicom Denmark A/S , Poppelgårdvej 11, DK-2860 Søbor, Phone number: +45 46 32 74 55.

"**Personal Data**" means any information that refers, is related to, or is associated with an identified or identifiable individual or as otherwise may be defined by applicable law.

The key points listed below are presented in further detail throughout this Privacy Notice. These key points do not substitute for the full Privacy Notice.

- **Personal Data We Collect.** When you visit the Site and/or fill out or "contact us" form and/or contact us with questions or complaints, we collect Personal Data provided by you, such as your name and email address, company name, country and any additional information you provide. When you visit our Site, we automatically collect your IP address and operating system and other information about your use of the Site.
- **How We Use Your Personal Data.** We use the information (including Personal Data) we collect and/or receive mainly to administer and provide the Site, contact you with (administrative) information and improve the Site.
- **Basis for Processing Your Personal Data.** Processing your Personal Data is necessary for the provision of the Site to you. Processing for the purposes of developing new and enhancing our products and Services, for contacting you with marketing materials relating to our products and services, for analytics and usage analysis, for fraud prevention and security, for our recordkeeping and protection of our legal rights, and complying with our legal obligations – are all necessary for the purposes of legitimate interests that we pursue.
- **Sharing the Personal Data We Collect.** We share the Personal Data we collect with our service providers and subcontractors who assist us in the operation of the Site and process the information on our behalf and under our instructions. We share Personal Data with certain co-controllers, as listed below.
- **International Transfer.** We use service providers and/or subcontractors and/or cooperate with or have business partners and affiliates located in countries other than your own, and send them your Personal Data. We will ensure to have agreements in place with such parties ensuring the same level of privacy and data protection as set forth in this Privacy Notice. You hereby consent to such international transfer.

- **Your Rights.** Subject to applicable law and additional rights as set forth below, you may have a right to access, update and/or delete your Personal Data and obtain a copy of the Personal Data we have collected about you. You have the right to object at any time to processing your personal data for certain purposes, including marketing purposes.
- **Use of Cookies and Similar Technologies.** We use cookies and similar technologies to help personalize your experience by helping save your settings and customizations across visits and providing you targeted content and advertisements matching your interests, which we have identified based on your activity and browsing history on the Site as well as for analytical purposes. You can adjust your settings to determine which cookies you do or do not allow. Changing your settings and/or deleting existing cookies may affect the Services.
- **Data Retention.** We retain information for as long as necessary for the purposes set forth in this Privacy Notice. To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether those purposes can be achieved through other means, as well as applicable legal requirements.
- **Security.** We implement industry standard measures aimed at reducing the risks of damage and unauthorized access or use of Personal Data, but they do not provide absolute information security. Such measures include physical, electronic, and procedural safeguards (such as secure servers, firewalls, antivirus and SSL encryption of data), and access control and other internal security policies.
- **Children.** We do not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.
- **Third-Party Applications and Services.** All use of third-party applications or services is at your own risk and subject to such third party's privacy policies.
- **Communications.** Subject to your consent and applicable law, we may send you e-mail or other messages about us or our Services. You will be given the opportunity to unsubscribe from commercial messages and stop receiving future communication from us by following the UNSUBSCRIBE link in any such email or message, by emailing us at [contactus@silicom-usa.com](mailto:contactus@silicom-usa.com).
- **Changes to the Privacy Notice.** We may change this Privacy Notice from time to time and shall notify you of such changes.
- **Comments and Questions.** If you have any comments or questions about this privacy notice, or if you wish to exercise your legal rights with respect to your Personal Data, please contact us at [contactus@silicom-usa.com](mailto:contactus@silicom-usa.com).

### **Personal Data We Collect**

We collect information from you when you choose to use our Site, request information from us, complete online forms, or contact us for any other reason. Examples of the Personal Data that we collect from you when you engage in any of the activities detailed above include your name and email address, company name, country and any additional information you provide. Such Personal Data may be collected by us through the Site.

In addition, when you use the Site, certain information may be automatically gathered about your computer or mobile device, such as IP address and operating system, and subject to your consent as may be required under applicable law, browsing history and information about viewing and browsing history on our Site.

It is your voluntary decision whether to provide us with any such Personal Data, but if you refuse to provide such information we may not be able to provide you with the Site and/or Services.

## **How We Use Your Personal Data**

### **General**

We and any of our trusted third-party subcontractors and service providers use the Personal Data we collect from and about you for any of the following purposes: (1) to provide you with the Site; (2) to respond to your inquiries or requests, contact and communicate with you; (3) to develop new products or services and conduct analyses to improve our current content, products, and services; (4) to contact you with informational newsletters and promotional materials relating to our Site and services; (5) to review the usage and operations of our Site; (6) to use your data in an aggregated, non-specific format for analytical purposes (as detailed below); (7) to prevent fraud, protect the security of our Site, and address any problems with the Site; (8) to provide customer support; and (9) to satisfy our legitimate interests, while at all times ensuring that your rights and freedoms are not affected.

### **Statistical Information**

By analyzing all information we receive, including all information concerning users, we may compile statistical information across a variety of platforms and users ("**Statistical Information**"). Statistical Information helps understand trends and customer-needs so that new products and services can be considered and so that existing products and services can be tailored to customer desires. Statistical Information is anonymous and aggregated and we will not link Statistical Information to any Personal Data. We may share such Statistical Information with our partners, without restriction, on commercial terms that we can determine in our sole discretion.

### **Analytics**

We and/or our service providers or subcontractors, use analytics tools ("**Tools**"), including "Google Analytics" to collect information about the use of the Site and/or Services. Such Tools collect information such as how often users visit the Site, what pages they visit when they do so, and what other sites and mobile applications they used prior to visiting the Site. The Tools may collect certain Personal Data, and may link such Personal Data to specific information stored in our customer database. We use the information we get from the Tools to improve our Site and Services. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use located at <http://www.google.com/analytics/terms/us.html> and the Google Privacy Policy located at <http://www.google.com/policies/privacy/>.

### **Legal Uses**

We may use your Personal Data as required or permitted by any applicable law.

## **Basis for Processing Your Personal Data**

Processing your Personal Data is necessary for the provision of the Site to you, including responding to your inquiries or requests, contacting and communicating with you. When you make a purchase, use our services or engage in any other transaction with us, we may also process your Personal Data to perform that contract.

Processing for the purposes of developing new and enhancing our products and Services, for provision of marketing materials relating to our products and services to you, for analytics and usage analysis, for fraud prevention and security, for our recordkeeping and protection of our legal rights, and complying with our legal obligations – are all necessary for the purposes of legitimate interests that we pursue. In conducting such processing activities, we balance these legitimate interests against the rights and interests of our users. If you would like more information regarding how we make such determinations, please contact us through the contact information specified below.

Please note that we may process your Personal Data for more than one legal basis depending on the specific purpose for which we are using your Personal Data. Please contact us if you would like details about the specific legal ground we are relying on to process your Personal Data.

## **Disclosure of Information**

We share your information, including Personal Data, as follows:

### **Business Partners, Service Providers, Affiliates and Subcontractors**

We disclose information, including Personal Data we collect from and/or about you, to our trusted service providers, subcontractors, affiliates and business partners, who use such information to: (1) help us provide you with the Site and/or any contact request submitted by you through the Site; (2) aid in their understanding of how users are using our Site.

Such service providers, subcontractors, affiliates and business partners include:

<b>Name</b>	<b>Role</b>	<b>Location</b>
Google Analytics	Data Analytics	United States
LinkedIn	Data Analytics	United States

### **Data Controllers**

When you use our Site and/or Services, we also disclose your Personal Data to additional third parties, which act as co-controller with respect to the collection of your Personal Data. The details and contact information of such controllers are as set forth below:

<b>Co-controller Name</b>	<b>Mailing Address</b>	<b>Phone number</b>
Silicom Connectivity Solutions Inc.	6 Forest Ave, Paramus, New Jersey 07652, USA	1-800-474-5426
Silicom Denmark A/S	Poppelgårdvej 11, DK-2860 Søborg	+45 4632 7455

### International Transfer

We use subcontractors and service providers and have business partners and affiliates who are located in countries other than your own (as set forth above) and send them information we receive (including Personal Data). We conduct such international transfers for the purposes set forth above. We will ensure that these third parties will be subject to written agreements ensuring the same level of privacy and data protection as set forth in this Privacy Notice, including appropriate remedies in the event of the violation of your data protection rights in such third country.

Whenever we transfer your Personal Data to third parties based outside of the European Economic Area (EEA), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your Personal Data to countries that have been deemed to provide an adequate level of protection for Personal Data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in the EEA.
- Where we use providers based in the US, we may transfer data to them if they have been certified by the EU-US Privacy Shield which requires them to provide similar protection to Personal Data shared between the Europe and the US or any other arrangement which has been approved by the European Commission.

Please contact us through the contact information listed below if you would like further information on the specific mechanism used by us when transferring your Personal Data out of the EEA.

You hereby consent to such international transfer described above.

### Business Transfers

We may transfer our databases containing your Personal Data if we sell our business or part of it, including in cases of liquidation. Information about our users, including Personal Data, may be disclosed as part of, or during negotiations of, any merger, sale of company assets or acquisition and shall continue being subject to the provisions of this Privacy Notice.

### Law Enforcement Related Disclosure

We will fully cooperate with any law enforcement authorities or court order requesting or directing us to disclose the identity, behavior or (digital) content and information of or related to an individual, including in the event of any user suspected to have engaged in illegal or infringing behavior. We may also share your Personal Data with third parties: (i) if we believe in good faith that disclosure is appropriate to protect our rights, property or safety (including the enforcement of the Terms and this Privacy Notice); (ii) to protect the rights, property or safety of third parties; (iii) when required by law, regulation subpoena, court order or other law enforcement related issues; or (iv) as is necessary to comply with any legal and/or regulatory obligation. You can request such Personal Data as specified herein by emailing us at [contactus@silicom-usa.com](mailto:contactus@silicom-usa.com).

## Other Uses or Transfer of Your Information

We allow you to use our Site and Services in connection with third-party services, sites, and/or mobile applications. If you use our Site and/or Services with or through such third-parties, we may receive information (including Personal Data) about you from those third parties. Please note that when you use third-parties outside of our Site and/or Services, their own terms and privacy policies will govern your use of those services.

## Security

We make efforts to follow generally accepted industry standards to protect the Personal Data submitted to and collected by us, both during transmission and once we receive it, including by implementing the below:

Safeguards - The physical, electronic, and procedural safeguard we employ to protect your data include secure servers, firewalls, antivirus and SSL encryption of data.

Access Control - We dedicate efforts for a proper management of system entries and limit access only to authorized personnel on a need to know basis of least privilege rules and revoke access immediately after employee termination.

Internal Policies - We maintain and regularly review and update our privacy related and information security policies.

Personnel - We require new employees to sign non-disclosure agreements according to applicable law and industry customary practice.

Encryption - We encrypt the data in transit using secure SHA256 protocols.

Database Backup – Our databases are backed up on a periodic basis for certain data and which are verified regularly. Backups are encrypted and stored within the production environment to preserve their confidentiality and integrity and are tested regularly to ensure availability, and are accessed only by authorized personnel.

However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## Your Rights - How to Access and Limit Our Use of Certain Information

You have certain rights in relation to the Personal Data that we or our co-controllers hold about you, as detailed below. For any requests to exercise such rights with respect to information held by our co-controllers, please contact the applicable co-controller directly. If you wish for us to notify all co-controllers, please specify that when you contact us in order to exercise any of your rights. We reserve the right to ask for reasonable evidence to verify your identity before we provide you with any information and/or comply with any of your requests, as detailed below:

- **Right of Access and Data Portability.** You have a right to know what Personal Data we collect about you and, in some cases, to have the information communicated to you. Subject to the limitations in applicable law, you may be entitled to obtain from us a copy of the Personal Data you provided to us (excluding information that we obtained from other sources) in a structured, commonly-used, and machine-readable format, and you may have the right to (request that we) transmit such Personal Data to another party. If you wish to exercise this right, please contact us letting us know what information in particular you would like to receive and/or transmit. Subject to applicable law, we may charge you with a fee. Please note that we may not be able to provide you with all the information you request, for instance, if the information includes Personal Data about another person. Where we are not able to provide you with information that you have asked for, we will endeavor to explain to you why. We will try to respond to any request for a right of access as soon as possible.
- **Right to Correct Personal Data.** Subject to the limitations in applicable law, you may request that we update, correct or delete inaccurate or outdated Personal Data and/or that we suspend the use of Personal Data, the accuracy of which you may contest, while we verify the status of that Personal Data. We will correct your Personal Data within a reasonable time from the receipt of your written request thereof.
- **Deletion of Personal Data ("Right to Be Forgotten").** In certain circumstances you have a right to have Personal Data that we hold about you deleted. Should you wish to have any Personal Data about you deleted, please contact us, using the contact information specified in this Privacy Notice. Subject to applicable law, we will delete Personal Data provided to us by a user within a reasonable time from the receipt of a written (including via email) request by such user to delete such collected Personal Data. We cannot restore information once it has been deleted. Please note that to ensure that we do not collect any further Personal Data, you should also clear our cookies from any device where you have visited our Site. We may retain certain Personal Data (including following your request to delete) for audit and record-keeping purposes, as well as other purposes, all as permissible and/or required under applicable law. We may also retain your information in an anonymized form.
- **Right to Restrict Processing.** You may request at any time that we limit the processing of your Personal Data if you believe that either: (i) the Personal Data is inaccurate and wish us to limit processing until we verify its accuracy; (ii) the processing is unlawful, but you do not wish us to erase the Personal Data; (iii) we no longer need the Personal Data for the purposes for which it was collected, but you still need it for the establishment, exercise, or defense of a legal claim; (iv) you have exercised your Right to Object (below) and we are in the process of verifying our legitimate grounds for processing. We may continue to use your Personal Data after a restriction request either: (a) with your consent; (b) for the establishment, exercise or defense of legal claims; or (iii) to protect the rights of another natural or legal person.
- **Direct Marketing Opt Out.** You can change your mind at any time about your election to receive marketing communications from us and/or having your Personal Data processed for direct marketing purposes. If you do, please notify us by contacting us as detailed in this Privacy Notice. We will process your request as soon as reasonably possible, however it may take a few days for us to update our records before any opt out is effective.
- **Right to Object.** Subject to applicable law, you may have the right to object to processing of your Personal Data for certain purposes.

- **Withdrawal of Consent.** You may withdraw your consent in connection with any processing of your Personal Data based on a previously granted consent.
- **Supervisory Authority.** If you are a European Citizen, you may have the right to submit a complaint to the relevant supervisory data protection authority.

### **Data Retention**

Subject to applicable law, we retain information as necessary for the purposes set forth above. We may delete information from our systems, without notice to you, once we deem it is no longer necessary for the purposes set forth in this Privacy Notice. We may also retain your information in an anonymized form. In addition, retention by any of our processors may vary, in accordance with the processor's retention policy.

To determine the appropriate retention period, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether those purposes can be achieved through other means, as well as applicable legal requirements.

Please contact us through the contact information listed below if you would like details regarding the retention periods for different types of your Personal Data.

### **Cookies and Similar Technologies**

We use cookies and similar technologies to help personalize your experience. Third parties through which we provide the Services and/or our business partners may be placing and reading cookies on your browsers, or using web beacons to collect information in the course of advertising being served on different websites. By using and in interacting with our Site, you consent to the use of and placement of cookies and other similar technologies on your device as specified herein.

#### **What are Cookies?**

A cookie is a small piece of text that is sent to a user's browser or device. The browser provides this piece of text to the device of the originating user when this visitor returns.

- A "session cookie" is temporary and will remain on your device until you leave the Site.
- A "persistent" cookie may be used to help save your settings and customizations across visits. It will remain on your device for much longer or until you delete it.
- First-party cookies are placed by us, while third-party cookies may be placed by a third party. We use both first- and third-party cookies.
- Information may also be collected through web beacons, which are small graphic images ("pixel tags"), which usually work together with cookies in order to identify users and user behavior. These may be shared with third parties.

We may use the terms "cookies" to refer to all technologies that we may use to store data in your browser or device or that collect information or help us identify you in the manner described above.

### How We Use Cookies

We use cookies and similar technologies for a number of reasons, for example, in order to help personalize your experience by helping save your settings and customizations across visits and provide you with targeted content matching your interests, which we have identified based on your activity and viewing history on our Site, for the functionality of the Site, for the security of the Site and for analytics.

The specific names and types of the cookies, web beacons, and other similar technologies we use may change from time to time. However, the cookies we use generally fall into one of the following categories:

Type of Cookie	Why We Use These Cookies
Necessary	These cookies are necessary in order to allow the Site to work correctly. They enable you to access the Site, move around, and access different services, features, and tools. Examples include remembering previous actions (e.g. entered text) when navigating back to a page in the same session. These cookies cannot be disabled.
Functionality	These cookies remember your settings and preferences and the choices you make (such as language or regional preferences) in order to help us personalize your experience and offer you enhanced functionality and content.
Security	These cookies can help us identify and prevent security risks. They may be used to store your session information to prevent others from changing your password without your login information.
Performance	These cookies can help us collect information to help us understand how you use our Site, such as whether you have viewed messages or specific pages and how long you spent on each page. This helps us improve the performance of our Site.
Analytics	These cookies collect information regarding your activity on our Site to help us learn more about which features are popular with our users and how our Site can be improved.
Advertising	These cookies are placed in order to deliver content, including ads relevant and meaningful to you and your interests. They may also be used to deliver targeted advertising or to limit the number of times you see an advertisement. This can help us track how efficient advertising campaigns are, both for our own Services and for other websites. Such cookies may track your browsing habits and activity when visiting both our Site and those of third-parties.

### How to Adjust Your Preferences

Most Web browsers are initially configured to accept cookies, but you can change this setting so your browser either refuses all cookies or informs you when a cookie is being sent. In addition, you are free to delete any existing cookies at any time. Please note that some features of the Services may function improperly when cookies are disabled or removed.

## Third Party Cookies

Google Analytics

## **Third-Party Applications and Services**

All use of third-party applications or services is at your own risk and subject to such third party's privacy policies.

## **Communications**

Subject to your consent and applicable law, we may send you e-mail or other messages and/or a newsletter about us or our Services. You will be given the opportunity to unsubscribe from commercial messages and stop receiving future communication from us by following the UNSUBSCRIBE link in any such email or message, by emailing us at [contactus@silicom-usa.com](mailto:contactus@silicom-usa.com)

## **Children**

We do not knowingly collect personally-identifiable information from children under the age of sixteen (16). In the event that you become aware that an individual under the age of sixteen (16) has enrolled without parental permission, please advise us immediately.

## **Changes to the Privacy Notice**

If you do not agree with the terms of this Privacy Notice, please do not use the Site. We may update this Privacy Notice from time to time, in which case, we shall notify you of such changes. We will post the updated Privacy Notice on this page. Please come back to this page every now and then to make sure you are familiar with the latest version. Any new Privacy Notice will be effective from the date it is accepted by you.

## **Comments and Questions**

If you have any comments or questions about this Privacy Notice, or if you wish for us to amend or delete your Personal Data, or exercise any other of your legal rights, please contact us at [contactus@silicom-usa.com](mailto:contactus@silicom-usa.com).

Last updated: December 2018