

# ANAREN, INC.'S PRIVACY POLICY

**Effective: November 2014**

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## **Introduction**

Anaren, Inc. (“**Anaren**,” “**Company**,” “**Our**,” “**We**,” or “**Us**”) respects your privacy and is committed to protecting it through our compliance with this Privacy Policy.

This policy describes the types of information we may collect from you or that you may provide when you visit and use our website located at <http://www.anaren.com> and any subdomains of <http://www.anaren.com> (collectively the “**Website**”). This policy also describes the types of information we may collect from you or that you may provide when you download and use our mobile application (Anaren’s “**Atmosphere Mobile Application**”), download and use our programmer utility (Anaren’s “**Atmosphere Programmer Utility**”), and access and use our development tool (Anaren’s “**Atmosphere Development Tool**”) (collectively “**Anaren’s Atmosphere Software Development Kit**” (“**Atmosphere SDK**”)), and our practices for collecting, storing, using, maintaining, protecting and disclosing that information.

## **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- to present our Website and its contents to you;
- for search engine optimization purposes;
- to customize and/or improve the performance, content and functionality of our Website and Atmosphere SDK;
- to provide you with information, technical support, products or services that you request from us;
- to allow third party service providers to perform services on our behalf;
- to fulfill any other purpose for which you provide it;
- to provide you with notices about your account, including expiration and renewal notices;
- to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;

- to notify you about changes to our Website and Atmosphere SDK, or any products or services we offer or provide through any of the foregoing;
- to allow you to participate in interactive features on our Website;
- to prevent and detect fraud and other misuse of the Website and/or Atmosphere SDK;
- in any other way we may describe when you provide the information; and
- for any other purpose with your consent.

We may also use your information to contact you about our own or third-parties' goods and services that may be of interest to you. If you do not want us to use your information in this way, please see the "Opt-Out Option for Atmosphere SDK" Section below.

### **Collection, Use and Storage Use of Personal Information**

As discussed and defined further below, we may collect, store, and/or use personal information about those who access and use our Website and register to use and/or download our Atmosphere SDK (for the purposes described above). The collection, storage, and/or use of personal information shall be limited to the purposes identified above (or otherwise specifically identified/described to you), unless otherwise obvious or within your reasonable expectation, or as otherwise permitted or required by law.

You can visit our Website without revealing any personal information. We do, however, collect, store, and/or use personal information when it is voluntarily submitted to us (e.g., when requesting specific product or service information, registering to use aspects of our Website, and/or registering to use and/or downloading our Atmosphere SDK). You should be aware that any personal information posted by you on any of our Website's public forums, message boards or any other interactive or social pages can be seen, collected, and used by other members of the public who we are not responsible for and are not under our control. As such, we suggest you use your discretion prior to posting any personal information. Also, after such information is posted, we may not be able to remove such posted information.

### **Collection, Use and Storage Use of Non-Personal Information**

We may also collect, store, and/or use non-personal information (for the purposes described above) via a variety of tracking technologies. As discussed further below, this information may include information such as details of your visits to and use of our Website, including traffic data, location data, and other meta data including information regarding the number of downloads of available information on our Website, and of your use of our Atmosphere SDK.

## **Policy Application**

This policy applies to information we collect:

- on this Website;
- in e-mail, text and other electronic messages between you and the Website, including, but not limited to, informational postings on any forums, message boards, Wiki pages, or any other interactive, social, live chat, or informational pages (Note, the forums and Wiki pages are publicly accessible by anyone accessing our Website. Creation of content on the forums and Wiki pages, however, is restricted to registered users only);
- through the Atmosphere Mobile Application you download from and may use in conjunction with this Website;
- through the Atmosphere Programmer Utility you download from and may use in conjunction with this Website;
- through the Atmosphere Development Tool you access and use in conjunction with this Website; and
- when you interact with our advertising and applications on third-party websites and services, if those applications or advertising include links to this policy.

It does not apply to information collected by:

- us offline or through any other means, including on any other website operated by us or any third party (including our affiliates and subsidiaries); or
- any third party (including our affiliates and subsidiaries), including through any application or content (including advertising) that may link to or be accessible from or on the Website.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is to (i) not access or use our Website, and (ii) not download, access and/or use any aspect of our Atmosphere SDK. By accessing and/or using this Website, and/or downloading, accessing and/or using our Atmosphere SDK, you agree to this Privacy Policy. This Policy may change from time to time. Your continued access and/or use of this Website and/or our Atmosphere SDK after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates.

## **Children Under the Age of 13**

Our Website and our Atmosphere SDK are not intended for children under 13 years of age, and Company does not specifically target the Website or the Atmosphere SDK to children under 13 years of age. No one under age 13 may provide any

information to or on the Website or Atmosphere SDK. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website or Atmosphere SDK, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 13, please contact us via the "Contact Information" set forth at the end of this Policy.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website and Atmosphere SDK, including information:

- by which you may be personally identified, such as name, company name, postal address, e-mail address, telephone number, date of birth (for the purpose of complying with applicable children's privacy statutes), or any other identifier by which you may be contacted online or offline ("**personal information**");
- that is about you but individually does not identify you, such as statistical data related to your use of the Website and/or the Atmosphere SDK;
- about your use of the Website and/or the Atmosphere SDK;
- about and related to your creations of mobile application(s) and development board firmware through use of the Atmosphere SDK;
- about your postings on any forums, message boards, Wiki pages, or any other interactive, social, live chat, or informational pages; and/or
- about your internet connection, the equipment you use to access our Website and usage details, and location of such equipment.

We collect this information:

- directly from you when you provide it to us; and
- automatically as you navigate through and use the Website and/or the Atmosphere SDK.

Personal information is not required to be shared with us in order for the Atmosphere Mobile Application to function.

### **Information You Provide to Us.**

The information we collect on or through our Website and Atmosphere SDK that you provide to us may include:

- information that you provide by filling in forms on our Website or through another website. This includes information provided at the time of registering to use aspects of our Website, registering to use and/or downloading our Atmosphere Mobile Application (at another website or through a link from our Website), registering to use and/or downloading our AIR Programmer Utility, registering to use our Atmosphere Development Tool, posting material, or requesting further services or alerting us of any issues or problems with the foregoing. We may also ask you for information if and when you enter a contest or promotion sponsored or offered by us;
- records and copies of your correspondence (including e-mail addresses), if you contact us;
- your responses to surveys that we might ask you to complete for research purposes;
- details regarding e-mail, text and other electronic messages between you and the Website, including, but not limited to, informational postings on any forums, message boards, Wiki pages, or any other interactive, social, live chat, or informational pages;
- details of transactions you carry out through our Website or Atmosphere SDK; and
- your search queries on the Website.

As noted, you may provide information to be published or displayed (hereinafter, "**posted**") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "**User Contributions**"). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

### **Information We Collect Through Automatic Data Collection Technologies.**

As you navigate through and interact with our Website and Atmosphere SDK, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- details of your visits to and use of our Website, including traffic data, location data, and other meta data including information regarding the number of downloads of available information on our Website (e.g., white papers, product datasheets, flyers); number of viewers that watch our product or other videos and slideshows including duration of each video and/or slideshow watched; how many users use our "Buy Now" or other

“buy” or “purchase” link (as described further below); and logs and other communication data and the resources that you access and use on the Website;

- details of your use of the Atmosphere SDK; and
- information about your computer or mobile device and internet connection, including your IP address, operating system and browser type, location based data including geographic location of your computer or mobile device, and unique computer or mobile device identifiers.

We also may use these technologies to collect information about and related to your creation of mobile application(s) and development board firmware through use of the Atmosphere SDK. You can avoid this mobile application and development board firmware information collection by downloading the source code of your particular mobile application/development board firmware project(s) and work on such project(s) outside of the Atmosphere SDK environment.

The information we collect automatically is statistical data and may include personal information, or we may maintain the statistical data or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and/or Atmosphere SDK and to deliver a better and more personalized service, including by enabling us to:

- estimate our audience size and usage patterns;
- store information about your preferences and particular uses of our Website and Atmosphere SDK, allowing us to customize and/or improve the performance, content and functionality of our Website and Atmosphere SDK according to your individual interests; and
- recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Google Analytics.** This is a specific type of metric tracking. See Google’s privacy policy <http://www.google.com/policies/privacy/> for further details regarding the type of information collected using this tool.
- **Heat Map Tracking.** This technology tracks a user’s behavior and use of particular features of our Website and/or Atmosphere SDK.

## **Disclosure of Your Information**

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect or you provide as described in this privacy policy:

- to our subsidiaries and affiliates;
- to contractors, service providers and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them;
- to a buyer or other successor in the event of a merger, acquisition, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by Company about our Website users is among the assets transferred;
- to fulfill the purpose for which you provide it;
- for any other purpose disclosed by us when you provide the information; and/or
- with your consent.

We may also disclose your personal information:

- to comply with any court order or subpoena, law or legal process, including responding to any government, regulatory request, law enforcement agency or other public agency;
- to enforce or apply our Website terms of use, terms of our Atmosphere Development Tool License, terms of our Atmosphere Mobile Application End User License Agreement, and other agreements; and/or
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Company, our customers or others, or if we feel that such disclosure may prevent the instigation of a crime, protect the security or integrity of our Website or Atmosphere SDK, or enable us to take precautions against liability.

## **Choices About How We Use and Disclose Your Information**

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

### **Accessing and Correcting Your Information**

You can review and change your personal information by logging into the Website and visiting your account profile page.

You may also send us an e-mail at [privacy\\_policy@anaren.com](mailto:privacy_policy@anaren.com) to request access to, correct or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our Website terms of use.

### **Purchases of Anaren Products and Third Party Websites**

You will not be able to purchase products directly on our Website. However, you will be able to purchase Anaren products through a “Buy Now” or other “buy” or “purchase” link to another website run and maintained by an independent third party (e.g., Octopart.com). Once you leave Anaren’s website for any reason per any means, Anaren’s privacy policy no longer applies and Anaren is not responsible for the privacy practices of any independent third party. It is incumbent upon you to be familiar with the privacy policies of other websites you may visit.

### **Your California Privacy Rights**

California Civil Code Section § 1798.83 permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an e-mail to [privacy\\_policy@anaren.com](mailto:privacy_policy@anaren.com)

### **Data Security**

We have implemented measures designed to secure your personal information under Company’s control from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password(s) for access to certain parts of our Website and/or Atmosphere SDK, you are responsible for keeping this password(s) confidential. We ask you not to share your password(s) with anyone. We urge you to be

careful about giving out information in public areas of the Website like forums or message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we have implemented commercially reasonable safeguards to protect your personal information that we collect and store, no data security safeguards are foolproof and we cannot guarantee the security of your personal information. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website or Atmosphere SDK.

### **Changes to Our Privacy Policy**

It is our policy to post any changes we make to our Privacy Policy on this page and accessible from the homepage of the Website. If we make material changes to how we treat our users' personal information, we will notify you by e-mail to the primary e-mail address specified in your account and/or through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this Privacy Policy to check for any changes.

### **Opt-Out Option for Atmosphere SDK**

You can stop all collection of information by the Atmosphere Mobile Application and AIR Programmer Utility by uninstalling the Atmosphere Mobile Application from your mobile device and by uninstalling the AIR Programmer Utility from your computer, respectively. You may use the standard uninstall processes as may be available as part of your mobile device and computer. You can stop all collection of information by the Atmosphere Development Tool by stopping all use of the Atmosphere Development Tool and by logging out and remaining logged out of the Tool.

### **Contact Information**

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

[privacy\\_policy@anaren.com](mailto:privacy_policy@anaren.com)