

# Privacy Policy



Effective April 25, 2022

In this Privacy Policy ("**Privacy Policy**"), we, Analog Devices, Inc., provide information about how we collect, use, and transfer your personal data through our websites and other sites or locations that we operate and on which we post a link to this Privacy Policy (collectively the "**Site**"). This Privacy Policy consists of a general section and local provisions that apply to users in specific locations.

We reserve the right to change, modify, add, or remove this Privacy Policy at any time in our sole discretion but will actively alert you that changes have been made. When you visit the Site, you are accepting the current version of this Privacy Policy as posted on the Site at that time. We also recommend that users revisit this Privacy Policy on occasion to learn of any changes.

If you have any questions about this Privacy Policy or you would like to exercise any of the rights mentioned in this Privacy Policy, you can contact us in any of the following ways:

Email: [dataprivacy@analog.com](mailto:dataprivacy@analog.com)

Address: One Analog Way, Wilmington, MA 01887 (Attention: Legal and Risk Organization, Data Privacy)

Toll-free Number: +1 (855) 601-5263

**EU, Middle East & Africa, Data Protection Officer:** Nicole Jahn, [Nicole.Jahn@analog.com](mailto:Nicole.Jahn@analog.com)

**UK, Data Protection Officer:** Dev Patel, [Dev.Patel@analog.com](mailto:Dev.Patel@analog.com)

**Americas, Data Protection Officer:** Jodi Dahlgard, [Jodi.Dahlgard@analog.com](mailto:Jodi.Dahlgard@analog.com)

**Asia Pacific (except China) Data Protection Officer:** Marc Salarda, [Marc.Salarda@analog.com](mailto:Marc.Salarda@analog.com)

**China Data Protection Officer:** Grace Lin, [Grace.Lin@analog.com](mailto:Grace.Lin@analog.com)

Note that we may need to request specific information from you to help us confirm your identity before we respond to your request. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. Information received from you for verification purposes will only be used to verify your identity. In certain circumstances, we may request a copy of your government identification to assist us in verifying your identity. We may also contact you to ask you for further information in relation to your request to speed up our response.

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## 1. Who We Are

Analog Devices, Inc. and its subsidiaries form a group of different legal entities (collectively the "**ADI Group**"). This Privacy Policy is issued on behalf of the ADI Group so when we mention, "we", "us" or "our" in this Privacy Policy, we are referring to the ADI Group collectively and to a legal entity of the ADI Group individually. The

ADI Group includes various Maxim Integrated entities. Details of the entities making up the ADI Group are available [here](#).

Analog Devices, Inc. ("**ADI**") is the data controller. This means that ADI decides how your personal data is processed and for what purposes. Where for a specific processing activity a subsidiary decides how your personal data is processed and for what purposes, that subsidiary is the controller for that personal data processing. Where ADI and a particular subsidiary decide collectively how and for what purposes personal data is processed, ADI and the subsidiary act as joint controllers for that processing activity. We will inform you separately if one of these situations occurs.

## 2. Collection Methods

Your personal data is (i) provided by you; (ii) obtained from third parties; and/or (iii) created by us in the course of your use of our Site. Further, to the extent permitted by applicable law, we may combine the personal data created by us in the course of your use of our Site with the personal data you provided to us.

## 3. Types of Personal Data We Collect

We may process the following types of personal data:

- **Identity Data** includes first name, last name, username or similar identifier.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Product Data** includes information collected about you to fulfil a product or service for you.
- **Usage Data** includes information about how you use our Site, products, and services. This includes website cookies.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use, and share non-personally identifiable information, such as anonymized or aggregated data, for purposes such as analysis, identifying trends in the areas of our products and to help research and develop new ADI Services. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

Via our Site, we collect, store, and use the personal data as set out in the "personal data" column below. Further, you may find per type of personal data the purpose for the processing, the legal basis and the retention period. Where we rely on our legitimate interest, we have also specified our particular legitimate interests.



# Privacy Policy



#	What we collect	Why we use it	Legal basis (where relevant under applicable laws)	How long we keep it
1.	<p>Information that you give us to make a purchase or request samples, whether online or over the phone including:</p> <ul style="list-style-type: none"> <li>Your name, address, email address, phone number, company name, residence city, zip code, job title, and myAnalog account;</li> <li>Your bank account details, such as payment information, invoice information, and order information;</li> <li>The details you provide to open an account with us;</li> <li>The product purchased.</li> </ul>	<ul style="list-style-type: none"> <li>Provide our products and services;</li> <li>Manage and administer our services;</li> <li>Process your order;</li> <li>Take payment from or give you a refund;</li> <li>Provide support;</li> <li>On board you as a client;</li> <li>Help us ensure that our customers are genuine and to prevent fraud;</li> <li>Share your contact information with third-party distributors, authorized affiliates and vendors.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary to perform the contract.</li> <li>We ask for your consent to share your contact information with third-party distributors, authorized affiliates and vendors so they can contact you regarding ADI Group's products and services, including additional customer support.</li> </ul>	<ul style="list-style-type: none"> <li>The length of the contract between us and 10 years after, except where shorter timeframes are identified for specific locations.</li> <li>We will keep information longer if there are any issues.</li> </ul>
2.	<p>Information you give us to receive marketing communications including:</p> <ul style="list-style-type: none"> <li>Your name</li> <li>Your email address</li> <li>Phone number</li> <li>Social media identifier</li> </ul>	<ul style="list-style-type: none"> <li>Send communications about new products, references designs, design tools, technical articles and design resources</li> </ul>	<ul style="list-style-type: none"> <li>We ask consent to send communications, unless applicable laws allow us to send communications on the basis of opt-out in which case we will send communications until you opt-out.</li> </ul>	<ul style="list-style-type: none"> <li>Until you withdraw your consent or opt-out.</li> </ul>
3.	<p>Information about the way you use our services including:</p>	<ul style="list-style-type: none"> <li>Develop new services;</li> <li>Improve our services;</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary to perform the contract.</li> </ul>	<ul style="list-style-type: none"> <li>If a current or former customer, see #1 above.</li> </ul>

	<ul style="list-style-type: none"> <li>The things that we have provided or you've purchased;</li> <li>When and where you have made the purchases;</li> <li>What you paid and how;</li> <li>Whether you've opened electronic communications from us;</li> <li>Whether you have clicked on links in electronic communications from us.</li> </ul>	<ul style="list-style-type: none"> <li>Identify products and marketing that may be of interest to you;</li> <li>Personalize our service of things you're interested in and how you use our services;</li> <li>Statistical analysis and research.</li> </ul>	<ul style="list-style-type: none"> <li>We have a legitimate business interest to improve our service and better understand how customers use it.</li> <li>We provide you with options to reject personalized service offered based on automated decision-making mechanism, if it is required by applicable laws.</li> </ul>	<ul style="list-style-type: none"> <li>Where consent is required, the length of the consent.</li> <li>Where consent is not required, the following numbers of years after the document or information is no longer current: Russia, China, Hong Kong, India, Philippines, &amp; Thailand (3 years after); Canada &amp; United States (5 years after); Singapore &amp; Sweden (6 years after); Malaysia (7 years after); Japan (10 years after); Taiwan (15 years after).</li> </ul>
4.	<p>Information when you communicate with us whether in person, through our website or via email, over the phone, through social media or via any other medium, including:</p> <ul style="list-style-type: none"> <li>Your contact details (this may include your social media account if that's the way you communicate with us);</li> <li>The details of your communications with us;</li> <li>The details of our communications to you.</li> </ul>	<ul style="list-style-type: none"> <li>Answer any issues, concerns, requests;</li> <li>Monitor customer communications for quality and training purposes.</li> <li>Develop new services;</li> <li>Improve our services;</li> <li>Personalize our service.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary to perform the contract.</li> <li>We have a legitimate business interest in understanding customer feedback and in responding to customer communications in a consistent way.</li> </ul>	<ul style="list-style-type: none"> <li>Where consent is required, the length of the consent.</li> <li>Where consent is not required, the following numbers of years after the document or information is no longer current: Russia, China, Hong Kong, India, Philippines, &amp; Thailand (3 years after); Canada &amp; United States (5 years after); Singapore &amp; Sweden (6 years after); Malaysia (7 years after); Japan (10 years after); Taiwan (15 years after).</li> </ul>
5.	<p>Information provided as part of your account including:</p>	<ul style="list-style-type: none"> <li>Provide our services;</li> <li>Manage and administer our systems;</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary to provide an account;</li> <li>We have a legitimate business interest in</li> </ul>	<ul style="list-style-type: none"> <li>As set forth in #1 above.</li> <li>Where consent is required, the length of the consent.</li> </ul>

# Privacy Policy



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<ul style="list-style-type: none"> <li>Your username;</li> <li>Your password;</li> <li>Your account settings;</li> <li>Your account preferences;</li> <li>Your email address;</li> <li>Social media identifier.</li> </ul>	<ul style="list-style-type: none"> <li>Identify how you would like to use your account.</li> </ul>	<p>enabling you to update your preferences and settings online.</p>	<ul style="list-style-type: none"> <li>Where consent is not required, the following numbers of years after the document or information is no longer current: Russia, China, Hong Kong, India, Philippines, &amp; Thailand (3 years after); Canada &amp; United States (5 years after); Singapore &amp; Sweden (6 years after); Malaysia (7 years after); Japan (10 years after); Taiwan (15 years after).</li> </ul>
<p>6. Information that we collect through your use of our website including:</p> <ul style="list-style-type: none"> <li>Device information such as operating system, unique device identifiers, the mobile network system;</li> <li>Hardware and browser settings;</li> <li>Date and time of requests;</li> <li>The requests you make;</li> <li>The pages you visit, the link clicked, and search engine terms you use;</li> <li>IP address and location;</li> <li>How you navigate to and from our website and its content;</li> <li>Your preference, the products and/or services that you have viewed or searched for;</li> </ul>	<ul style="list-style-type: none"> <li>Provide our services (including targeted marketing which you can opt out);</li> <li>Develop new services;</li> <li>Improve our services;</li> <li>Identify issues with the website and user's experience of it;</li> <li>Security monitoring and protection;</li> <li>Detect and prevent fraud;</li> <li>Monitor the way our website is used.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary to perform the contract.</li> <li>We have a legitimate business interest to provide you with our service, to develop and improve our services and to ensure a secured online environment.</li> <li>It is necessary for the performance of legal obligations.</li> </ul>	<ul style="list-style-type: none"> <li>As set forth in #1 above.</li> <li>Where consent is required, the length of the consent.</li> <li>Where consent is not required, the following numbers of years after the document or information is no longer current: Russia, China, Hong Kong, India, Philippines, &amp; Thailand (3 years after); Canada &amp; United States (5 years after); Singapore &amp; Sweden (6 years after); Malaysia (7 years after); Japan (10 years after); Taiwan (15 years after).</li> </ul>

	<ul style="list-style-type: none"> <li>Crashes, download errors, and response times.</li> </ul>			
7.	<p>Information that we collect from third party partners and corporate customers, which could include:</p> <ul style="list-style-type: none"> <li>Credit reference agencies;</li> <li>Payment processing companies;</li> <li>Your bank;</li> <li>Other individuals, entities or affiliates with in your group;</li> <li>Publicly available sources such as the electoral roll;</li> <li>Other members of a loyalty program;</li> <li>Distributors, partners, or customers.</li> </ul>	<ul style="list-style-type: none"> <li>Provide our services;</li> <li>Manage and administer our systems;</li> <li>Take payment from or give you a refund;</li> <li>Help us ensure that our customers are genuine and to prevent fraud;</li> <li>Personalize our service;</li> <li>Statistical analysis and research into our clients;</li> <li>Combine this information with other types of information mentioned above.</li> </ul>	<ul style="list-style-type: none"> <li>It is necessary for the contract to provide our services, that we collect information from some third-party sources to process payments or give refunds;</li> <li>It is necessary to verify details to meet legal and regulatory requirements for identifying our customers;</li> <li>It is necessary in the public interest that we can verify identities and prevent fraud;</li> <li>We have a legitimate business interest in receiving information from other entities in our group/other members of our loyalty scheme about shared customers;</li> <li>We have a legitimate business interest in understanding our customer base.</li> <li>We have a legitimate business need to comply</li> </ul>	<ul style="list-style-type: none"> <li>As set forth in #1 above.</li> <li>Where consent is required, the length of the consent.</li> <li>Where consent is not required, the following numbers of years after the document or information is no longer current: Russia, China, Hong Kong, India, Philippines, &amp; Thailand (3 years after); Canada &amp; United States (5 years after); Singapore &amp; Sweden (6 years after); Malaysia (7 years after); Japan (10 years after); Taiwan (15 years after).</li> </ul>

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			with applicable regulations.	
8.	<p>Information that we collect incidentally from other sources or public sources, including:</p> <ul style="list-style-type: none"> <li>Information available in the media;</li> <li>Information presented on our social media timelines;</li> <li>Information required by law for verifying your personal identity;</li> <li>Information collected by security systems.</li> </ul>	<ul style="list-style-type: none"> <li>Maintain market awareness;</li> <li>Build and maintain social media branding;</li> <li>Provide security to our sites.</li> </ul>	<ul style="list-style-type: none"> <li>We have a legitimate business interest in maintaining a public profile and being in both traditional and social media;</li> <li>We have a legitimate business interest in providing security over our business.</li> <li>We process your personal data that has been legally publicized by you or others within a reasonable scope, to the extent permitted by applicable laws.</li> </ul>	<ul style="list-style-type: none"> <li>Information relating to media awareness and social media, for as long as the information is publicly available;</li> <li>Information collected incidentally by security systems we will keep this for as long as reasonable in accordance with applicable policy.</li> </ul>
9.	<p>Information that we collect from vendors, distributors, agents, and service providers:</p> <ul style="list-style-type: none"> <li>Contact details of individuals working for the companies</li> <li>Other personal information regarding such individuals.</li> </ul>	<ul style="list-style-type: none"> <li>Build relationships with other organizations.</li> </ul>	<ul style="list-style-type: none"> <li>It's necessary to conclude and perform the contract.</li> <li>We have a legitimate business interest in developing and maintaining relationships with vendors, partners and other companies and dealing with individuals who work for them.</li> </ul>	<ul style="list-style-type: none"> <li>The length of the contract between us and 10 years after, except in case there are any issues, except as follows:</li> <li>France &amp; Korea (5 years after); U.K., India, &amp; Singapore (6 years after); Ireland, Israel, Netherlands, Malaysia &amp; Japan (7 years after); China (8 years after); Spain (15 years after).</li> </ul>

\* Where multiple retention periods apply to the same data, the longer period will govern. Retention periods are subject to change by ADI.

#### 4. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, 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 we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are set forth above.

#### 5. Opt-Out

Subject to any laws that require a recipient to receive communications on an opt-in basis, in connection with promotions or other projects, we may ask you specifically whether you have objections against a certain kind of data use or sharing. If you opt-out under such circumstances, we will respect your decision.

To opt-out of receiving further commercial emails or to unsubscribe from services, e-mail us at [dataprivacy@analog.com](mailto:dataprivacy@analog.com) or click the unsubscribe link that is included in the message. Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions. Please note that third parties with whom we share your personal data for marketing purposes, have their own data privacy policies, which may differ from ours and you would have to contact them separately with respect to opt-out requests.

#### 6. Disclosures of Personal Data

To the extent applicable, we will disclose or share your personal data to / with the following third parties:

Party	Location	Personal data
Our Group company(ies)	Australia, Austria, Brazil, Canada, China, Denmark, France, Germany, Hong Kong, India, Ireland, Israel, Italy, Japan, Korea, Malaysia, Mexico, Netherlands, Philippines, Scotland, Serbia, Singapore, Spain, Sweden, Switzerland, Taiwan, Thailand, Turkey, United Kingdom, and the United States.	<ul style="list-style-type: none"> <li>• <b>Identity Data</b> includes first name, last name, username or similar identifier.</li> <li>• <b>Contact Data</b> includes billing address, delivery address, email address and telephone numbers.</li> <li>• <b>Transaction Data</b> includes details about payments to and from you and other details of products and services you have purchased from us.</li> <li>• <b>Technical Data</b> includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.</li> </ul>

Party	Location	Personal data
		<ul style="list-style-type: none"> <li>• <b>Profile Data</b> includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.</li> <li>• <b>Product Data</b> includes information collected about you to fulfil a product or service for you.</li> <li>• <b>Usage Data</b> includes information about how you use our Site, products and services.</li> <li>• <b>Marketing and Communications Data</b> includes your preferences in receiving marketing from us and our third parties and your communication preferences.</li> <li>• <b>Combined Personal Data</b> <u>includes combined data sets of</u> aggregated data and your personal data.</li> </ul>
Distributors, agents, vendors, and service providers.	We have business partners in many jurisdictions.	The personal data as described in the row above.

Further:

- Subject to legal requirements, we may share your information as required by law or in the interest of protecting or exercising our or others' legal rights, e.g., without limitation, in connection with requests from law enforcement officials (such as supervisory authorities, investigative authorities or other governmental bodies) and in connection with court proceedings.
- We may share or transfer your information in connection with a prospective or actual sale, merger, transfer or other reorganization of all or parts of our business.
- Also, we reserve the right to fully use and disclose any information collected via the Site that does not qualify as personal data.

## 7. Where We Store and Process Your Personal Data

We store your personal data in ADI data centers in United States and other locations where ADI operates, including Ireland, Singapore and the Philippines. These can be made accessible for the ADI Group. Access will always be controlled on a need-to-know basis, and only provided where it is necessary to provide you with requested services or to allow us to perform any necessary or legitimate functions. Our processors may store your personal data in other locations. Please see an overview of our processors and their particular location [here](#).

If we share your personal data in accordance with this Privacy Policy with the ADI Group or third parties, we ensure that we meet all requirements following from the applicable privacy and data protection laws (if any).

## 8. Security

Transmissions over the internet are never 100% secure or error-free. However, we have put in place reasonable and appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

You should also safeguard any password and User ID you use to access the Site and notify [dataprivacy@analog.com](mailto:dataprivacy@analog.com) if you suspect that this password or User ID has been compromised. You are solely responsible for any unauthorized use of the Site conducted via your password and User ID.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

In addition to security measures, we also maintain physical and administrative procedures to safeguard and secure your information processed by us.

## 9. Third Party Links

Links on the Site to third party websites are provided solely as a convenience to you. If you use these links, you will leave the Site. We have not reviewed such third-party sites and are not responsible for their content or their privacy and security policies. Accordingly, we do not endorse or make any representations about these third-party sites, or about any information, software or other products or materials found there, or about any results that may be obtained from using them. If you decide to access any of these third-party sites, you do so at your own risk.

## 10. User Forums

If you use a user forum on the Site, you should be aware that any personal data you submit there can be read, collected or used by other users of these forums and could be used to send you unsolicited messages. We are not responsible for the information you choose to submit in these forums.

## 11. Children's Privacy

The Site is intended for adults. We do not intentionally or knowingly collect, personal data from children under the age of 13 and we request that individuals under the age of 13 not submit any personal information on the Site. If you – as a person with parental responsibility over the child – notice that your child has provided us with personal data without your approval (for instance by submitting an incorrect age), you may contact us at [dataprivacy@analog.com](mailto:dataprivacy@analog.com).

If we find out that we process personal data of a minor without approval of the person holding parental responsibility over the minor concerned, we will immediately remove the personal data.

## LOCAL PROVISIONS

## 12. LOCAL PROVISIONS: European Union

If you are based in the European Union, the following applies in addition to the remainder of this Privacy Policy:

- (a) **GDPR** means Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
- (b) **Member State** means a member state of the European Union.
- (c) Our representative for the EU is Nicole Jahn who can be contacted at [Nicole.Jahn@analog.com](mailto:Nicole.Jahn@analog.com), and our primary business address is Analog Devices International U.C., Bay F-1 Raheen Industrial Estate Limerick, Ireland.
- (d) If we share your personal data with our group company(ies) or third parties located outside the European Economic Area, we ensure appropriate safeguards are in place to guarantee the continued protection of your personal data, particularly by signing the Standard Contractual Clauses adopted by the European Commission (article 46(2)(c) GDPR). For more information on these Standard Contractual Clauses, please see [here](#). Additionally, where necessary, will adopt supplementary measures that ensure the level of protection of the data transferred up to the EU standard of essential equivalence. You have the right to receive a copy of the Standard Contractual Clauses we executed that apply to you.
- (e) Below we set out your rights in more detail and give information on how you can exercise these. Most of these rights are not absolute and are subject to exemptions in the law. We will respond to your exercise of right request within one month, but have the right to extend this period to two months. If we extend the response period, we will let you know within one month from your request. If your request is clearly unfounded or excessive, we reserve the right to charge a reasonable fee or refuse to comply in such circumstances.
  - (i) **Access:** You are entitled to ask us if we are processing your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
  - (ii) **Correction:** You are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected. If you have registered with [myAnalog.com](https://myAnalog.com) you can edit your personal data directly.
  - (iii) **Erasure:** You are entitled to ask us to delete or remove personal data in certain circumstances. There are certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with law or in connection with legal claims.
  - (iv) **Restriction:** You are entitled to ask us to suspend the processing of certain personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
  - (v) **Data portability:** You may request the transfer of a copy of certain personal data to you or another party (if technically feasible). You have the right to ask that we provide your personal data in an easily readable format to another company.

- (vi) **Objection:** Where we are processing your personal data based on our legitimate interest, you may object to processing on this ground. However, applicable laws may allow us to continue processing your personal data based on our legitimate interests.
- (vii) **Withdraw your consent:** Where you have provided your consent to the processing of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. The withdrawal of your consent does not affect the lawfulness of the processing based on your consent before its withdrawal.
- (viii) **Lodge a Complaint at a Supervisory Authority:** We will do our best to resolve any complaint. However, if you feel we have not resolved your complaint, you have a right to lodge a complaint with a supervisory authority in the country where you live, where you work or where an alleged infringement of the applicable data protection law took place. A list of EU supervisory authorities and their contact details is available [here](#).

### 13. LOCAL PROVISIONS: United Kingdom

If you are based in the United Kingdom, the following applies in addition to the remainder of this Privacy Policy:

- (a) **UK GDPR** means the Retained Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.
- (b) Our representative in the United Kingdom is Dev Patel who can be contacted at [Dev.Patel@analog.com](mailto:Dev.Patel@analog.com).
- (c) If we share your personal data with our group company(ies) or third parties located outside the United Kingdom, paragraph 12 (c) applies mutatis mutandis.

### 14. LOCAL PROVISIONS: China

If you are based in China, the following applies in addition to the remainder of this Privacy Policy:

- (a) **China Data Protection Laws** means the Personal Information Protection Law of China (effective as of 1 November 2021), the Data Security Law of China (effective as of 1 September 2021) and other applicable laws, as each may be amended or replaced from time to time, and any regulations implementing the foregoing.
- (b) **Personal Information Processor.** ADI with its registered address at One Analog Way, Wilmington, MA, 01887, USA (“ADI” or “us”) is the personal information processor of your personal information, unless otherwise stated.
- (c) Our representative in China is Grace Lin who can be contacted at [Grace.Lin@analog.com](mailto:Grace.Lin@analog.com).
- (d) We may collect and use your relevant personal information without your consent under the following circumstances:
  - (i). Where it is required to conclude and perform a contract to which you are a party;
  - (ii). Where it is required to perform statutory obligations or legal duties;
  - (iii). Where it is required to respond to public health emergencies, or protect the life, health, and property safety of natural persons in emergencies;

- (iv). Where personal information is processed to a reasonable extent for the purposes of news report, public opinion supervision and other acts for public interest;
  - (v). Where personal information has already been made public by your own or through other legitimate channels, and processing of such personal information is done pursuant to applicable laws and to a reasonable extent; and
  - (vi). Other circumstances provided in applicable laws, regulations, and national standards.
- (e) **Sensitive Personal Information.** Your personal information that is collected and processed by us may include sensitive personal information. Sensitive personal information refers to personal information that may easily cause harm to the dignity of natural persons or endanger personal or property safety. According to the services you use, your sensitive personal information processed by us may include payment information, invoice information, etc. It is necessary for us to process your sensitive personal information in order to provide the specific services to you and for other purposes described in this Privacy Policy. We will process your personal information (including sensitive personal information) in a way that has the least impact on your personal rights and interests (for example, grant access to personal information to necessary personnel only, use encryption technologies during transmission and storage of sensitive personal information when necessary, and conduct personal information protection security impact assessment).

You agree that we can process your sensitive personal information for the purposes stated in this Privacy Policy and in accordance with its provisions. If you do not want us to process your sensitive personal information, please do not use some of our services (we have already explained to you above the types of sensitive personal information to be collected and processed concerning specific services).

- (f) **Separate Consent.** Subject to the applicable China Data Protection Laws, we may ask for your separate consent if we process your sensitive personal information, share your personal information with a third party on a “controller to controller” basis, publicize your personal information, or transfer your personal information outside of China.
- (g) **International Transfer.** If we share your personal information with our group company(ies) or third parties located outside China, we ensure appropriate safeguards are in place to guarantee the continued protection of your personal information. Additionally, where necessary, we will apply for the security assessment conducted by the competent authority; get necessary certification; or sign the standard contract with the data recipient.
- (h) **Recipients of Your Personal Information.** ADI may share your personal information with our affiliated companies worldwide in order for us to conduct marketing and promotion of the products, services or activities you may be interested in, to help us analyze and know the users’ demand, to improve our products and services, to upgrade user experience, etc., in connection with the fulfilment of legitimate business uses that are intended to serve you.
- (i) **Rights.**

Chinese residents have the following rights under the China Data Protection Laws. We will respond your right request within 15 working days upon the receipt of your request. Otherwise, we will inform you of the delay and the reasons for such delay.

- **Right of Access and Copy:** You are entitled to request access to your personal information we are processing. This enables you to receive a copy of the personal information we hold about you.
  - **Right to Know:** You are entitled to request us to explain our processing rules for personal information.
  - **Right of Correction:** You are entitled to request that any incomplete or inaccurate personal information we hold about you is corrected. If you have registered with myAnalog you can edit your personal information directly.
  - **Right of Erasure:** You are entitled to ask us to delete or remove personal information if: the processing purpose has been achieved or is impossible to achieve, or the personal information is no longer necessary for relevant purposes; we cease to provide relevant products or services, or the storage period has expired; you have withdrawn consent and no other legal ground for processing exists; our processing of personal information violates applicable laws, administrative regulation or agreed-upon requirements; or other circumstances as proscribed by laws and administrative regulations happen. However, we may not be able to satisfy your request if: the storage period as prescribed by laws and administrative regulations does not expire; the erasure of personal information is technically unviable; or processing the personal information is necessary to comply with our legal obligations.
  - **Right to Data Portability:** Request us to transfer your personal information that we hold about you to another personal information processor that is designated by you. We will review your request, and if such request meets the applicable statutory requirements under relevant provisions formulated by the competent authorities, we will duly provide you with the channel for the transfer.
  - **Right to Withdraw Consent:** you are entitled to withdraw consent if we process your personal information based on your consent. If you withdraw your consent, we will no longer be able to provide you with services corresponding to the consent that you withdraw.
  - **Right to Object Automated Decision-Making:** You are entitled to object information pushing and commercial marketing based upon automated decision-making mechanism. Additionally, if a decision made upon automated decision-making would have a material impact on your rights and interests, you have the right to require us to explain the matter and to object the decision made solely upon automated decision-making.
  - **Right to De-Register Your myAnalog Account:** You can request us to de-register your MyAnalog account. After the de-registration, we will cease to provide you with our products and/or services, and according to your request, we will delete your personal information unless otherwise required by law.
- (j) To exercise any of your rights above, please email a request at [dataprivacy@analog.com](mailto:dataprivacy@analog.com). ADI will review and carry out valid requests. If the request is not deemed valid or cannot be processed, ADI will share the reasons why it is not valid or unable to process and your options for seeking resolution through a supervisory authority and through a judicial

remedy. You have the right to lodge a complaint against us with the competent PRC authority.

- (k) **Children's Privacy:** We do not intentionally or knowingly collect, personal information from children under the age of 14 in China. If you – as a person with parental responsibility over the child – notice that your child has provided us with personal information without your approval, you may contact us at [dataprivacy@analog.com](mailto:dataprivacy@analog.com) to request deletion.

## 15. LOCAL PROVISIONS: United States

If you are based in California, the following applies in addition to the remainder of this Privacy Policy:

- (a) **California Data Protection Laws** means the California Consumer Privacy Act of 2018 and the California Privacy Rights Act of 2020, as each may be amended or replaced from time to time, and any regulations implementing the foregoing.
- (b) **Notice at collection:** To learn more about the categories of personal information we have collected about California residents in the 12 months preceding the date this Privacy Policy was last updated, including the sources of collection and how we may use and share that information, please see the following charts: [Download California Personal Information Details](#) ("Chart"). We have collected such personal information from the following categories of sources: [Download Chart](#). We collected such personal information for the following purposes: [Download Chart](#). We shared such personal information with the following categories of third parties: [Download Chart](#). We collected the following specific pieces of personal information: [Download Chart](#). In the preceding 12 months we sold the following categories of personal information: We did not sell any consumers' personal information in the preceding 12 months. In the preceding 12 months, we disclosed the following categories of personal information about consumers for a business purpose: [Download Chart](#).
- (c) **Notice of Sale:** We do not sell the personal information of California residents. We also do not have any actual knowledge of selling the personal information of any California resident who is 16 years or younger.
- (d) **Do Not Track:** We may, from time to time, collect information about your online activities, over time and across different sites and applications. When you use our websites, third parties may also collect information about your online activities, over time and across different websites, online or cloud computing services, online applications, or mobile applications. Some browsers support a "Do Not Track" feature, which is intended to be a signal to websites that you do not wish to be tracked across different websites you visit. You may, however, disable certain tracking as discussed in our Cookie Notice.
- (e) **Shine the Light:** You may submit a request regarding the disclosure of your personal information by us to third parties for the third parties' direct marketing purposes. To submit such a request, please send an e-mail to [dataprivacy@analog.com](mailto:dataprivacy@analog.com).
- (f) **Rights:** California residents have certain rights under the CCPA, including the right to access, delete, and to non-discrimination.
- **Right to know:** you have the right to request from us, up to twice a year, a disclosure of: (i) the categories of personal we collected about and from you in the 12 months preceding the date of your request; (ii) the categories of sources from which we have collected that personal information; (iii) the business or commercial purpose for collecting or sharing that personal information; (iv) the categories of third parties with

whom we have shared that personal information; and (v) the specific pieces of personal information collected during that time frame.

- **Right to Delete:** You have a right to request that we delete your personal information, subject to certain exceptions such as to complete the transaction for which the information was collected, detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, identify and repair errors, to comply with a legal obligation, and for other recognized legal reasons.
- **Process to Submit a Request:** You have the right to submit a request to know or delete your personal information. You may e-mail us at [dataprivacy@analog.com](mailto:dataprivacy@analog.com). You may also designate an authorized agent to submit a request on your behalf. We will confirm receipt of, and respond to your requests as soon as possible, and in conformance with all applicable law.
- **Verification Method:** In order to ensure that changes are not made to your personal information without your authorization, and to protect against your personal information being disclosed to unauthorized parties, we will seek to verify your identity before responding to your request by using a reasonable method based on the type, sensitivity, and value of the personal information requested, including but not limited to matching the identifying information provided in your request with the information we have on file about you. Depending on the sensitivity of the personal information requested, we may also utilize more stringent verification methods to verify your identity, including but not limited to requesting additional information from you and/or requiring you to sign a declaration under penalty of perjury.
- **Right to Anti-Discrimination:** We will not discriminate against you for exercising your rights set forth under this paragraph. Further, in response to an exercise of data privacy rights, we will not:
  - Deny you goods or services.
  - Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
  - Provide you a different level or quality of goods or services.
  - Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- **Minors' Right to Erasure:** If you are a California resident under 18 years of age, you have the right to request and obtain the removal of content or information you posted on our social media environment where that qualifies as personal information. To submit such a request, please send an e-mail to [dataprivacy@analog.com](mailto:dataprivacy@analog.com). Removal does not ensure complete or comprehensive removal of the content or information you posted.