



Nikon Metrology Inc.

California Consumer Privacy Act Privacy Policy

Last updated: 28 November 2022

We, Nikon Metrology, Inc., issue this California Consumer Privacy Act Privacy Policy ("**CCPA Privacy Policy**") to provide information about how we collect, use, disclose and otherwise process California residents' personal information and rights that California residents may have under the CCPA. This CCPA Privacy Policy only applies to you if you reside in California. This CCPA Privacy Policy does not reflect our processing of California residents' personal information where an exception under the CCPA applies.

1. Our Personal Information Handling Practices over the Preceding 12 Months

The table below sets out the categories of non-sensitive and sensitive personal information (as defined by the CCPA) that we collected from California residents over the preceding 12 months, their source, and to whom and for what purpose we have disclosed the information. In the descriptions of these categories, "consumer" means "California resident". The table is followed by a description of the purposes for which we collected personal information from: (1) individual representatives of our prospective, current or past suppliers and customers (collectively, "**B2B contacts**"); and (2) our prospective, current and past employees and other personnel (collectively, "**employees**"). We do not sell or share for cross-context behavioral advertising any of the categories of personal information that we collect about California residents.

Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
Non-Sensitive Personal Information		
Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	Yes, from employees and B2B contacts themselves.	Yes, we disclosed this information to our service providers and contractors to receive services from them and to Nikon Group entities.
Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number,	Yes, from employees and B2B contacts themselves.	Same as above.



Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.		
Characteristics of protected classifications under California or federal law.	Yes, from employees themselves.	Same as above.
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes, from employees and B2B contacts themselves.	Same as above.
Biometric information	No	N/A
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.	Yes, from employees and B2B contacts themselves.	Yes, we disclosed this information to our service providers and contractors to receive services from them and to Nikon Group entities.
Geolocation data.	Yes, from employees themselves.	Same as above.
Audio, electronic, visual, thermal, olfactory, or similar information.	Yes, from employees and B2B themselves.	Same as above.
Professional or employment-related information.	Yes, from employees themselves.	N/A
Education information, defined as information that is not publicly available personally identifiable information as defined in the Family	Yes, from employees themselves.	N/A



Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).		
Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes, from the personal information that employees and B2B contacts provide themselves.	Yes, we disclosed this information to our service providers and contractors to receive services from them and to Nikon Group entities.
<i>Sensitive Personal Information</i>		
A consumer's social security, driver's license, state identification card, or passport number.	Yes, from employees themselves.	Yes, we disclosed this information to our service providers and contractors to receive services from them and to Nikon Group entities.
A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.	Yes, from employees themselves.	Same as above.
A consumer's precise geolocation.	Yes, from employees themselves.	Same as above.
A consumer's racial or ethnic origin, religious or philosophical beliefs, or union membership.	Yes, from employees themselves.	Same as above.
The contents of a consumer's mail, email, and text messages unless the business is the intended recipient of the communication.	Yes, from employees themselves.	Same as above.
A consumer's genetic data.	No	N/A
The processing of biometric information for the purpose of uniquely identifying a consumer.	No	N/A



Category of personal information	Did we collect? If so, from what source?	Did we disclose? If so, to whom and for what purpose?
Personal information collected and analyzed concerning a consumer's health.	Yes, from employees themselves.	Same as above.
Personal information collected and analyzed concerning a consumer's sex life or sexual orientation.	Yes, from employees themselves.	Same as above.

We use the personal information that we collect from **B2B contacts** for the following purposes:

- To order products and services from companies and other organizations;
- To provide products and services to companies and other organizations;
- To process payments and execute transactions;
- To initiate or receive shipments;
- To communicate with our B2B contacts, including to manage customer and vendor relationships, provide or receive customer service, pose or answer questions, raise or address concerns, and maintain business relationships;
- To maintain, secure, upgrade and enhance our online vendor and customer management systems;
- To enforce our contracts with vendors and customers;
- To better understand how we do business with vendors and customers;
- To send informational or promotional communications;
- To recruit employees, including evaluations of qualifications for possible employment or internship possibilities and employee onboarding;
- To carry out other purposes that are disclosed to B2B contacts and to which they consent; and
- To carry out any other purpose permitted or required by law.

We use the personal information that we collect from **employees** for the following purposes:

- To perform the services or provide the goods reasonably expected by our employees in their role as our employees, including those services and goods that are reasonably necessary for us to administer the employment relationship and for our employees to perform their duties;
- To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;



- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions;
- To ensure the physical safety of natural persons;
- For short-term, transient use;
- To perform services on behalf of us;
- To verify or maintain the quality or safety of our services and products;
- To improve, upgrade, or enhance our services and products;
- To perform functions that are required under laws that apply to us; and
- To fulfill the other purposes set forth in our privacy notices at collection to employees.

We do not have actual knowledge that we sell or share the personal information of California residents under 16 years of age. We do not use sensitive personal information for purposes other than those referred to in Subsection 1798.121(a) of the CCPA.

2. Your Rights under the CCPA

As a California resident, you have the following rights under the CCPA:

- The **right to know** what personal information we have collected about you, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you. You may only exercise your right to know twice within a 12-month period.
- The **right to delete** personal information that we have collected from you, subject to certain exceptions.
- The **right to correct** inaccurate personal information that we maintain about you.
- The **right to opt-out of the sale or sharing** of your personal information by us. We do not sell or share for cross-context behavioral advertising any of the categories of personal information that we collect about California residents.
- The **right to limit** our use of sensitive personal information to purposes specified in subsection 7027(l) of the California Consumer Privacy Act Regulations. We do not use sensitive personal information for purposes other than those specified in subsection 7027(l) of the California Consumer Privacy Act Regulations.
- The **right not to receive discriminatory treatment** by the business for the exercise of privacy rights conferred by the CCPA, including an employee's, applicant's, or independent contractor's right not to be retaliated against for the exercise of their CCPA rights.



3. How to Exercise Your CCPA Rights

- **Methods of Submission and Instructions:** To submit a request to exercise your **rights to know, delete or correct**, please email compliance.nm-us@nikon.com or call 1-800-552-6648 (toll free).
- **Verification:** Only you, or someone legally authorized to act on your behalf, may make a request related to your personal information. You may designate an authorized agent by taking the steps outlined under "Authorized Agent" further below. In your request or in response to us seeking additional information, you, or your authorized agent, must provide sufficient information to allow us to reasonably verify that you are, in fact, the person whose personal information was collected which will depend on your prior interactions with us and the sensitivity of the personal information being requested. We may ask you for information to verify your identity and, if you do not provide enough information for us to reasonably verify your identity, we will not be able to fulfil your request. We will only use the personal information you provide to us in a request for the purposes of verifying your identity and to fulfill your request.
- **Authorized Agents:** You can designate an authorized agent to make a request under the CCPA on your behalf if the authorized agent is a natural person or a business entity registered with the Secretary of State of California, we receive a written authorization stating that you have authorized the authorized agent to submit a request on your behalf which has been signed by you and the authorized agent, and we have verified the identity of you and the authorized agent. If you provide an authorized agent with power of attorney pursuant to California Probate Code sections 4000 to 4465, it may not be necessary to perform the above steps, and we will respond to any request from the authorized agent in accordance with the CCPA.

4. Contact Us

If you have questions or concerns about our privacy policies or practices, please contact us:

Email address: compliance.nm-us@nikon.com
Mail: Nikon Metrology, Inc.
ATTN: Internal Compliance/Data Privacy
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Brighton, MI 48116 U.S.A.