

## **ONESOURCE DATA COLLECTION AND PRIVACY PRACTICES**

We collect and use personal data to manage your relationship with oneSOURCE and better serve you when you are using oneSOURCE Services by personalizing and improving your experience. We use and otherwise process your data for the following business purposes:

### **CUSTOMER EXPERIENCE**

Providing you with a seamless customer experience by maintaining accurate contact and registration data, delivering comprehensive customer support, offering products, services, subscriptions and features that may interest you and enabling you to participate in contests and surveys. We also use your data to deliver a tailored experience, personalize the oneSOURCE Services and communications you receive and create recommendations based your use of oneSOURCE Services.

### **TRANSACTION SUPPORT**

Assisting you in completing transactions and orders of our products or services and administering your account.

### **PRODUCT SUPPORT & IMPROVEMENT**

Improving the performance and operation of our products, solutions, services and support, including warranty support and timely firmware and software updates and alerts to ensure the continued operation of the device or service. For more information, please see the section on Information Automatically Collected About Your Use of oneSOURCE Services.

### **ADMINISTRATIVE COMMUNICATIONS**

Communicating with you about oneSOURCE Services. Examples of administrative communications may include responses to your inquiries or requests, service completion or communications required by law or applicable corporate updates.

### **SECURITY**

Maintaining the integrity and security of our websites, products, features and services and preventing and detecting security threats, fraud or other criminal or malicious activity that might compromise your information. When you interact with us, we will also take reasonable steps to verify your identity, such as requiring a password and user ID, before granting access to your personal data.

### **BUSINESS OPERATIONS**

Conducting ordinary business operations, verifying your identity, conducting business research and analytics, corporate reporting and management, staff training and quality assurance purposes (which may include monitoring or recording calls to our customer support) and outreach.

### **RESEARCH & INNOVATION**

Innovating new products, features and services using research and development tools and incorporating data analysis activities.

## **ADVERTISING**

Providing personalized promotional offers (in accordance with your Privacy Preferences) on oneSOURCE Services and other selected partner websites (for example, you might see an advertisement for a product on a partner site that you have recently viewed on an oneSOURCE site). We might also share some of your information with selected partners, marketing service providers and digital marketing networks to present advertisements that might interest you. To learn more, read Use of Cookies.

## **COMPLIANCE WITH LAW**

Compliance with applicable laws, regulations, court orders, government and law enforcement requests, to operate our services and products properly and to protect ourselves, our users and our customers and to solve any customer disputes.

Personal data is any information that personally identifies you or from which you could be identified either directly or indirectly. We may collect your personal data through your use of oneSOURCE Services or during interactions with oneSOURCE representatives.

The categories of personal data we collect from you depends on the nature of your interaction with us or on the oneSOURCE Services you use, but may include the following:

### **INFORMATION COLLECTED ABOUT YOU**

**Contact Data** – We may collect personal and/or business contact information including your first name, last name, mailing address, telephone number, fax number, email address and other similar data and identifiers.

**Account Data** – We collect information such as how you purchased or signed up for oneSOURCE Services, your transaction, billing and support history, the oneSOURCE Services you use and anything else relating to the account you create.

**Location Data** – We collect geolocation data when you enable location-based services or when you choose to provide location-related information during product registration or when interacting with our website.

**Security Credentials Data**– We collect user IDs, passwords, password hints, and similar security information required for authentication and access to oneSOURCE accounts.

**Preferences** – We collect information about your preferences and interests as they relate to oneSOURCE Services (both when you tell us what they are or when we deduce them from what we know about you) and how you prefer to receive communications from us.

**Other Unique Identifying Information** – Examples of other unique information that we collect from you include information you provide when you interact in-person, online or by phone or mail with our services centers, help desks or other customer support channels, your responses to customer surveys or additional information you have provided to us to facilitate delivery of oneSOURCE Services and to respond to your inquiries.

## **INFORMATION AUTOMATICALLY COLLECTED ABOUT YOUR USE OF oneSOURCE SERVICES**

**Product Usage Data** – We collect product usage data such as pages printed, IFUs added to favorites, and searches.

**Device Data** – We collect information about your computer such as browser version, unique device identifiers, advertising identifiers and additional technical information that varies by product.

**Application Data** – We collect information related to oneSOURCE applications such as location, language, software versions, data sharing choices and update details. In cases where we incorporate technologies from third parties, data may be shared between the third party and oneSOURCE and appropriate notice will be provided at the application level.

**Performance Data** – We collect information regarding the performance of individual device hardware components, firmware, software and applications. Examples of the data we collect include information relating to memory and processor performance, embedded web server, and additional technical information that varies by device.

**Website Browsing Data** – We collect information about your visits to and your activity on our oneSOURCE websites, applications or websites “powered by” another company on our behalf including the content (and any ads) that you view and interact with, the address of the website from which you arrived and other clickstream behavior (such as the pages you view, the links you click or which items you’ve added to your shopping basket). Some of this information is collected using cookies, web beacons embedded web links and similar technologies. To learn more, read Use of Cookies.

**Anonymous or Aggregated Data** – We collect anonymous answers to surveys or anonymous and aggregated information about how our oneSOURCE Services are used. In certain cases, we apply a process of de-identification or pseudonymization to your data to make it reasonably unlikely to identify you through the use of that data with available technology.

Please note: Some web browsers incorporate “Do Not Track” features. Currently, no industry standard exists for handling “Do Not Track” requests, therefore at this time, our websites may not respond to “Do Not Track” requests or headers from these browsers.

## **INFORMATION FROM THIRD-PARTY SOURCES**

We collect data from the following third parties:

**oneSOURCE Partners** – If you purchase oneSOURCE Services from an oneSOURCE partner, we may receive certain information about your purchase from that partner. We may also receive cookie data and insights.

**oneSOURCE Enterprise Customers** – In order to provide certain oneSOURCE Services at an enterprise level, your business contact data may be provided to oneSOURCE by a designated entity within your business or enterprise (such as a member of your IT department).

Analytics Providers – We also receive non-personal data, such as aggregated or de-identified demographic/profile data, from third-party sources including select partners and companies that specialize in providing enterprise data, analytics and software as a service.

In order to ensure data accuracy and offer a superior customer experience by providing you with better personalized services, content, marketing and ads, in some cases we link or combine the information that we collect from the different sources outlined above with the information we collect directly from you. For example, we compare the geographic information acquired from commercial sources with the IP address to derive your general geographic area. Information may also be linked via a unique identifier such as a cookie or account number.

Where necessary, we obtain information to conduct due diligence checks on business contacts as part of our anti-corruption compliance program and in accordance with our legal obligations.

#### **IF YOU CHOOSE NOT TO PROVIDE DATA**

You are not required to share the personal data that we request, however, if you choose not to share the information, in some cases we will not be able to provide you with oneSOURCE Services, certain specialized features or be able to effectively respond to any queries you may have.

When we transmit highly-confidential information (such as credit card number or password) over the internet, we protect it through the use of encryption, such as later versions of the Transport Layer Security (“TLS”) protocol.

We keep your personal data for as long as necessary to provide you with oneSOURCE Services, for legitimate and essential business purposes, such as making data-driven business decisions, complying with our legal obligations, and resolving disputes. The retention periods for oneSOURCE business records vary depending on the type of record and is governed by oneSOURCE’s records retention policy.

Business records including records relating to customer and vendor transactions are maintained while active and as required by law.

Following the expiration of the retention period, electronic records are permanently erased so as to ensure that they cannot be restored and physical records are destroyed in a manner where they cannot be reproduced (e.g., shredding).

If you request, we will delete or anonymize your personal data so that it no longer identifies you, unless, we are legally allowed or required to maintain certain personal data.

We will only share your personal data as follows and, when applicable, only with the appropriate contractual obligations in place:

## **SHARING WITH SERVICE PROVIDERS & PARTNERS**

We engage service providers or partners to manage or support certain aspects of our business operations on our behalf. These service providers or partners may be located in the US or in other global locations and may provide services such as fraud management services, customer support, sales pursuits on our behalf, order fulfillment, product delivery, content personalization, advertising and marketing activities (including digital and personalized advertising), IT services, email service providers, data hosting, live-help, debt collection and management or support of oneSOURCE websites. Our service providers and partners are required by contract to safeguard any personal data they receive from us and are prohibited from using the personal data for any purpose other than to perform the services as instructed by oneSOURCE.

## **SHARING OTHER INFORMATION WITH ADVERTISERS**

We may also transfer information about you to advertising partners (including the ad networks, ad-serving companies, and other service providers they may use) so that they may recognize your devices and deliver interest based content and advertisements to you. The information may include your name, postal address, email, device ID, or other identifier in encrypted form. The providers may process the information in hashed or de-identified form. These providers may collect additional information from you, such as your IP address and information about your browser or operating system and may combine information about you with information from other companies in data sharing cooperatives in which we participate. For more information, read Use of Cookies.

## **CORPORATE TRANSACTIONS**

Circumstances may arise where, whether for strategic or other business reasons, oneSOURCE decides to sell, buy, merge or otherwise reorganize businesses. In such transactions, we may disclose or transfer your personal data to prospective or actual purchasers or receive personal data from sellers. Our practice is to seek appropriate protection for your personal data in these types of transactions.

## **COMPLIANCE WITH LAW**

We may also share your personal data when we believe, in good faith, that we have an obligation to: (i) respond to duly authorized information requests of law enforcement agencies, regulators, courts and other public authorities, including to meet national security or other law enforcement requirements; (ii) comply with any law, regulation, subpoena, or court order; (iii) investigate and help prevent security threats, fraud or other criminal or malicious activity; (iv) enforce/protect the rights and properties of oneSOURCE or its subsidiaries; or (v) protect the rights or personal safety of oneSOURCE, our employees, and third parties on or using oneSOURCE property when allowed and in line with the requirements of applicable law.

We do not, and will not, sell personal data to third parties. We do permit third parties to collect the personal data described above through our Services and share personal data with third parties for business purposes as described in this Privacy Statement, including but not limited to providing advertising on our Services and elsewhere based on users' online activities over time and across different sites, services, and devices (so-called "interest-based advertising"). The information practices of these third parties are not covered by this Privacy Statement.

You can make or change your choices regarding subscription or general communications from oneSOURCE at the data collection point or by using other methods, which are described in the following section. These options do not apply to communications primarily for the purpose of administering order completion, contracts, support, product safety warnings, driver updates, or other administrative and transactional notices where the primary purpose of these communications is not promotional in nature.

### **MARKETING & SUBSCRIPTION COMMUNICATIONS**

oneSOURCE marketing communications provide information about products, services, and/or support and you can select how these communications are delivered – e.g., via postal mail, email, telephone, fax or mobile device. Marketing communications may include new product or services information, special offers, personalized content, targeted advertising or invitations to participate in market research or compliance reviews. Subscription communications include email newsletters, software updates, etc. that may be expressly requested by you or which you consented to receive.

You may opt out of receiving these general communications by using one of the following methods:

Select the email's "Opt out" or "Unsubscribe" link, or follow the instructions included in each email subscription communication. You can also disable automatic data collection tools, such as web beacons, in email messages by not downloading images contained in messages you receive from oneSOURCE (this feature varies depending on the email software used on your personal computer). However, doing this may not always disable data collection in the email message due to specific email software capabilities. For more information about this, please refer to the information provided by your email software or service provider.

### **USE OF COOKIES AND OTHER TECHNOLOGIES**

We use and allow select partners to use cookies, clickstream capture, pixels, web beacons, web collection forms and other similar technologies (collectively "Automatic Data Collection Tools") on our oneSOURCE Services. We do this to understand your use of our oneSOURCE Services; improve your user experience and enable personalized features and content; optimize our advertisements and marketing; and to enable third-party advertising companies to assist us in serving ads specific to your interests across the Internet.

You can find more information about these technologies at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **ONLINE AUTOMATIC DATA COLLECTION TOOLS**

When you visit any oneSOURCE website, it may store or retrieve information on your browser, mostly in the form of cookies. This information might be about you, your preferences or your device and is mostly used to make the site work as you expect it to and can give you a more personalized web experience. oneSOURCE uses Automatic Data Collection Tools for the following reasons:

**Strictly Necessary Tools:** These are necessary for the website to function and cannot be switched off. Without these, the website or service you are requesting would be impossible to provide essential functionalities (like checkout) or display appropriate content based on the type of device you are using.

**Performance and Analytics Tools:** These tools collect aggregated, anonymous, statistical-type information to enable oneSOURCE to measure, optimize and improve the content, quality and performance of its websites.

We use our own and/or third-party Automatic Data Collection Tools to see how you use our websites and services in order to enhance their performance and develop them according to the preferences of our customers and visitors. For example, Automatic Data Collection Tools may be used to: test different designs and to ensure that we maintain a consistent look and feel across our websites; track and provide trend analysis on how our users interact with our websites and communications; track errors and measure the effectiveness of our promotional campaigns. We use third party tools to track website usage and activity, for example but not limited to Adobe Analytics & Google Analytics.

The data collected will generally be aggregated to provide trends and usage patterns for business analysis, site/platform improvement and performance metrics. Our Automatic Data Collection Tools or the resulting analysis may be also shared with our business partners. The type of information we collect includes how many visitors visit our websites, how many customers log in, when they visited, for how long and which areas of our websites and services but is generally not used to identify you individually. We may also receive similar information about visitors to our partner websites.

**Personalization Tools:** These allow us to remember choices you make on our websites (such as your preferred language or the region you are in) and provide enhanced, more personalized features. These technologies are also used to provide content that aligns to your past behavior or interests.

We also use Automatic Data Collection Tools to change the way our websites behave or look in order to personalize your experience from information we infer from your behavior on our websites or information we may already know about you because, for example, you are a registered customer. These may be used to tailor the services you receive from us or the content, look and feel delivered to you on subsequent sessions to our websites. For example, if you personalize webpages, or register for products or services, Automatic Data Collection Tools help our webpage server recall your specific information. When you next visit our websites, the information you previously provided can be retrieved, so you can easily use the website features that you previously chose. If you use more than one device or computer on a regular basis, we may link Automatic Data Collection Tools together so you will still receive a personalized online experience. We can also personalize the information you see based on what we already know about you, so that you spend less time looking for things. With the use of Automatic Data Collection Tools, each visitor to our site can have a web experience which is unique to them.

**Targeting Tools:** These are set by oneSOURCE and other third parties (such as select retail or advertising networks) and used to build a profile to deliver targeted advertising off oneSOURCE websites and applications that is more relevant and useful to you. These may reflect de-identified demographic or other data linked to data you voluntarily have submitted to us (e.g. your email address).

These also allow us to collect data related to the oneSOURCE site and page you visited and your activities on the oneSOURCE site. As an example, if you visited one of our product pages, via the use of cookies, we may retarget you across partner sites with additional offers and promotions for a certain period of time.

You can find out more about some of our interest-based advertising partners by visiting these websites:

<https://www.doubleclickbygoogle.com/>  
<http://www.oracle.com/us/legal/privacy/marketing-cloud-data-cloud-privacy-policy/index.html>  
<https://www.adobe.com/privacy/marketing-cloud.html>  
<https://www.google.com/policies/technologies/ads/>

Please note that the above is not an exhaustive list and may be updated by us from time to time.

If you are a registered user, the information collected from our websites is not anonymous and we may use this information along with other information we know or infer about you including your preferences to tailor content, services, advertising and offers for you.

Automatic Data Tools that are Strictly Necessary, and third-party technologies used for Performance & Analytics or Personalization are set to expire after the industry standard 2 years. Automatic Data Collection Tools used for targeting are set to expire after 90 days since your last visit.

When you share information using a social media sharing button on oneSOURCE websites, the social network will record that you have done this. This information may be linked to targeting/advertising activities. The types of tools used by these third parties and how they use the information generated by them will be governed by those companies' privacy policies.

When you visit oneSOURCE sites, you have the option to accept or adjust what categories of cookies you allow us to place on your browser through our Privacy Preference Centre. You can modify these settings at any time by visiting

#### Cookie Settings

If you don't want to allow cookies at all, please refer to your browser settings. Note that by disabling certain categories of cookies, you may be prevented from accessing some features of our sites or certain content or functionality may not be available. Certain browsers allow you to navigate websites in an incognito or private mode. Once the browser session is closed, typically all cookies collected during the session are automatically destroyed.

Even if you opt-out of Performance & Analytics tracking and Targeting, you might continue to see non-personalized advertisements from oneSOURCE via our partners. As an example, you might visit a website containing Personal Computer feature comparisons. Based on your interest, our partners might serve you with oneSOURCE product advertisements.

In the US and Canada, we comply with the Digital Advertising Alliance industry standards with respect to interest based advertising. To learn more about your advertising choices if you are in the US, please click [here](#) or in Canada please click [here](#). In the US, the Network Advertising Initiative also offers a means to opt out of a number of advertising cookies. Please visit [www.networkadvertising.org](http://www.networkadvertising.org) to learn more. Note that opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver ads tailored to your web preferences and usage patterns.

Some web browsers incorporate “Do Not Track” features. Currently, no industry standard exists for handling “Do Not Track” requests, therefore at this time, our websites may not respond to “Do Not Track” requests or headers from these browsers.

## **SHARING WITH PARTNERS**

Based on your consent through our cookie settings, oneSOURCE may share targeting cookie data with select partners for the purposes of audience selection and advertisement. You can change your cookie settings at any time through our cookie settings tool.

oneSOURCE provides you with choices about the setting of cookies and other automatic data collection tools through our Cookie Preferences Center. You can learn more about our use of these tools in our Cookies and Use of Cookie Statement. You can adjust your preferences by visiting our Cookie Preferences Center.

You have the right to ask us for a copy of any personal data that you have provided to us or that we maintain about you and to request an explanation about the processing. In addition, you have the right to withdraw any consent previously granted or to request correction, amendment, restriction, anonymization or deletion of your personal data; and to obtain the personal data you provide with your consent or in connection with a contract in a structured, machine readable format and to ask us to transfer this data to another data controller.

You also have the right to object to the processing of your personal data in some circumstances, in particular when we are using your data for direct marketing or to create a marketing profile. Please see the oneSOURCE Communications Section for guidance on how to exercise your rights with regard to marketing and subscription communications.

In addition to the privacy controls available to you via this Privacy Statement, you can control your device data collection. In some instances, product usage data (not content of files) is collected and processed in order to deliver you the essential functionality of an oneSOURCE Service, such as remote printing, Instant Ink or other web-enabled service. You can control device data collection yourself through your device settings and preferences. oneSOURCE is not in a position to adjust your data collection settings without your active participation. Certain product usage data is necessary to provide oneSOURCE Services and disabling data collection may affect the availability or functionality of such services. Data collected for the fulfillment of such essential functionality will not be processed for direct marketing purposes. If you need assistance in adjusting your data collection settings, please contact oneSOURCE Customer Support.

In certain cases, these rights may be limited, for example if fulfilling your request would reveal personal data about another person or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests to keep.

We will not discriminate against you for exercising your rights and choices, although some of the functionality and features available on oneSOURCE Services may change or no longer be available to you. Any difference in the Services are related to the value provided.

To exercise your rights, or if you have any questions or concerns about our Privacy Statement, our collection and use of your data or a possible breach of local privacy laws, you can contact oneSOURCE's Chief Privacy and Data Protection Officer or write to us at the appropriate address below:

oneSOURCE Document Site  
735 Water St.  
Suite 516  
Milwaukee, WI 53204

All communications will be treated confidentially. Upon receipt of your communication, our representative will contact you within a reasonable time to respond to your questions or concerns. In some cases, we may request further information in order to verify your identity. We aim to ensure that your concerns are resolved in a timely and appropriate manner.

If we are unable to resolve your concerns, you have the right to contact a data privacy supervisory authority in the country where you live or work, or where you consider that the data protection rules have been breached or seek a remedy through the courts.

If we modify our Privacy Statement, we will post the revised statement here, with an updated revision date. If we make significant changes to our Privacy Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect.