

# CyrusOne: CCPA Consumer Privacy Notice

**Effective Date:** January 1, 2021

This California Privacy Notice (“**Notice**”) applies to “**Consumers**” as defined by the California Consumer Privacy Act (“**CCPA**”) and supplements other privacy policies or notices issued by CyrusOne (“**CyrusOne**,” “**we**,” “**our**,” or “**us**”). In the event of a conflict between any other CyrusOne policy, statement, or notice and this Notice, this Notice will prevail with respect to California Consumers and their rights under the CCPA.

In accordance with the CCPA’s requirements, Section 1 of this Notice covers the preceding 12 months and will be updated annually. This Notice describes our collection, use, disclosure, and other processing of California Consumers’ “**Personal Information**” (“**PI**”) as defined by the CCPA, as well as the rights California Consumers have under the CCPA. Terms defined in the CCPA that are used in this Notice have the same meanings as in the CCPA. Section 2 explains the privacy rights available to Californian Consumers.

Consistent with the CCPA, job applicants, current and former employees, our contractors, and subjects of certain business-to-business communications acting in their capacity as representatives of another business are not considered Consumers for purposes of this Notice or the rights described herein. Our job applicants, employees, and contractors may contact CyrusOne’s Human Resources team for additional information about the PI we collect from applicants and employees.

## **1. COLLECTION AND USE OF PERSONAL INFORMATION**

### **Categories of PI Collected and Disclosed**

We collect and disclose PI about California Consumers as described in the table below, which is based on our 2020 practices. In 2020 we offered only business-to-business services, and believe that the PI described below is technically exempt from the CCPA. However, we nonetheless describe PI we collected from California individuals as follows:

<b>Category of PI</b>	<b>Examples of PI Collected</b>	<b>Categories of Recipients of Disclosed PI</b>
<b>Identifiers</b>	Name, postal address, telephone number, email address, Internet Protocol address	Analytics and other service providers, social networks
<b>Biometric Information</b>	Fingerprint and/or retinal scans	Not disclosed
<b>Internet Usage Information</b>	Browsing history, search history, information regarding interactions with our website or advertisements	ISPs, analytics and other service providers, social networks
<b>Sensory Data</b>	CCTV footage	Not disclosed
<b>Professional or Employment Information</b>	Professional, educational, or employment-related information	Not disclosed

In addition, we may collect, use, and disclose your PI as required or permitted by applicable law.

We do not treat “**Deidentified**” data or “**Aggregate Consumer Information**” as PI, and we reserve the right to convert, or permit others to convert, your PI into Deidentified data or Aggregate Consumer Information.

We may share your PI with certain business partners, service providers, vendors, and other parties as described in the table above. These parties may use your PI for some or all of the above-listed business purposes, subject to the CCPA’s restrictions and obligations.

CyrusOne has not “**Sold**” (as the term “**Sell**” is defined by the CCPA) Consumer PI in the past year.

### **Sources of PI**

Based on our 2020 practices, we collect PI directly from you, your devices, and your browsers, including from your interactions with our website and advertisements. We collect PI from third-party research services and other vendors assisting us with our provision of services. We also collect certain PI from sources such as CCTV footage or biometric markers in use at our facilities with your consent.

### **Purposes for PI Collection**

In 2020, we collected PI for the following Business Purposes:

- Providing our services, including managing our interactions and transactions with you; verifying, maintaining, customizing, and servicing consumer accounts; customer communications; marketing and advertising; and other related services.
- Detecting security incidents and protecting against fraudulent, malicious, deceptive, or illegal activities;
- Quality control and troubleshooting our services to identify, repair, and improve our offerings; and
- Internal research and development.

In addition, we may collect PI of California Consumers in our capacity as a Service Provider to our clients, and our clients may use our services to store PI on systems that they control, which is not subject to this Section 1 or our disclosure obligations under the CCPA.

## **2. YOUR CALIFORNIA PRIVACY RIGHTS**

Under the CCPA, California Consumers have certain rights which they may exercise independently or through an authorized agent. CCPA rights requests are subject to an identification and verification process. We will not fulfill a CCPA rights request unless we have been provided sufficient information for us to reasonably verify the identity of the requestor and the validity of the request. These rights do not apply to us as a Service Provider to our clients, or with respect to PI on client systems that may be located in our facilities.

Some PI we maintain about Consumers (e.g., clickstream data) is not sufficiently associated with enough PI about the Consumer for us to be able to verify that it is a particular Consumer’s

PI. Accordingly, we will not include such information in response to Consumer requests. If we cannot comply with a request, we will explain the reasons in our response. We will use PI provided in your request to verify your identity or authority to make the request and to track and document request responses, unless you also provided the PI to us for another purpose.

Your California Consumer privacy rights are described below. To make a request, please email us at [privacy@cyrusone.com](mailto:privacy@cyrusone.com) or call us toll-free at 855-564-3198, option 2. We will take appropriate steps to confirm the identity of a Consumer making a request for purposes of verifying the authenticity of the request. You may be required to provide certain PI to allow us to verify that you are the Consumer about whom the request is being made. If you request that we provide you with specific pieces of information about you, we will apply heightened verification standards. An authorized agent may submit a request on behalf of a Consumer if the Consumer has provided the authorized agent with power of attorney in accordance with California law; alternatively, the agent must (1) present verifiable written authorization from the Consumer that the agent has the Consumer's permission to submit the request; and (2) independently verify the agent's own identity with CyrusOne.

### **Disclosure Rights (Right to Know)**

You have the right to request that we disclose the following information about your PI that we have collected and are maintaining for the 12-month period prior to your request date. Consumer requests of this nature may be made no more than two times in a 12-month period.

- The categories of PI we have collected about you.
- The categories of sources from which we collected your PI.
- The business or commercial purposes for collecting or Selling your PI.
- The categories of third parties to whom we have shared your PI.
- The specific pieces of PI we have collected about you.
- A list of the categories of PI disclosed for a business purpose in the prior 12 months, or that no disclosure occurred.
- A list of the categories of PI Sold about you in the prior 12 months, or that no Sale occurred. If we Sold your PI, we will explain (1) the categories of your PI we have Sold, and (2) the categories of third parties to which we Sold PI.

You have the right to make or obtain a portable copy of your PI that we (1) have collected in the 12 months prior to the request date and (2) currently are maintaining. Please note that we retain PI for various time periods in accordance with applicable law and our internal recordkeeping policies and procedures.

### **"Do Not Sell" Rights**

We do not Sell California Consumer PI as defined under the CCPA.

Some browsers include features that may be characterized as "Do Not Track" signals. Like many online services, we currently do not alter our practices when we receive a "Do Not Track" signal from a visitor's browser. Further, we do not interpret "Do Not Track" signals to represent a "do not sell" request for CCPA purposes. We understand that various parties are developing "do not sell" signals, and we may recognize certain such signals if we conclude such a program is appropriate.

## **Deletion Rights**

Except to the extent we have a basis for retention under the CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include retaining PI to complete transactions and provide services you have requested or that are reasonably anticipated, for security purposes, for legitimate internal business purposes such as maintaining business records, to comply with law or otherwise cooperate with law enforcement, and to exercise or defend legal claims.

## **Non-Discrimination Rights**

We will not discriminate against any Consumer in a manner prohibited by the CCPA because the Consumer chooses to exercise their CCPA rights.

### **3. California’s “Shine the Light” Law**

California’s “Shine the Light” law permits customers in California to request certain details about how certain types of their information are shared with third parties and, in some cases, affiliates, for those third parties’ and affiliates’ own direct marketing purposes. Under this law, a business must either provide California customers certain information upon request or permit California customers to opt in to, or opt out of, this type of sharing.

We do not share Personal Information with third parties or affiliates for those third parties’ or affiliates’ own direct marketing purposes. If you are a California resident, you may request information about our compliance with this law by contacting us at [privacy@CyrusOne.com](mailto:privacy@CyrusOne.com) or by sending a letter Privacy Compliance Officer, CyrusOne, 2850 N. Harwood Street, Suite 2200, Dallas, Texas 75201. Requests must include “California Privacy Rights Request” in the first line of the description and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

*Please note that “Shine the Light” rights and CCPA rights are established under different legal regimes and must be exercised separately.*

### **4. CONTACT US**

For more information regarding your California privacy rights, you may call us toll-free at 855-564-3198, option 2, or email us at [privacy@cyrusone.com](mailto:privacy@cyrusone.com). You may also write to us at:

CyrusOne  
**Attention: CCPA Inquiry**  
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Dallas, Texas 75201