

CyrusOne: CCPA Consumer Privacy Notice

Effective Date: January 1, 2020

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**” “**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, this Notice covers the calendar year 2019 and 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.

Consistent with the CCPA, job applicants, current and former employees, 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.

COLLECTION AND USE OF PERSONAL INFORMATION

We collect PI about California Consumers as described in the table below.

| Category | Examples of PI Collected | Sources of PI | Purposes for PI Collection | Categories of Recipients |
|-----------------------------------|---|--|--|--|
| Identifiers | Name, postal address, telephone number, email address, Internet Protocol address | Directly from the Consumer (or the Consumer’s interactions with our website or advertisements), from third-party research services | Managing interactions and transactions; protecting against fraud; performing services; marketing | Analytics and other service providers, social networks |
| Biometric Information | Fingerprint and/or retinal scans | Directly from the Consumer, with the Consumer’s consent | Detecting security incidents and protecting against fraud; quality/safety control | N/A |
| Internet Usage Information | Browsing history, search history, information regarding interactions with our website or advertisements | Consumer interactions with our website and advertisements | Debugging; processing and customizing concurrent Consumer interactions; quality control; marketing | ISPs, analytics and other service providers, social networks |

| Category | Examples of PI Collected | Sources of PI | Purposes for PI Collection | Categories of Recipients |
|---|--|---|---|--------------------------|
| Sensory Data | CCTV footage | Recordings made at CyrusOne facilities | Managing interactions and transactions; detecting security incidents and protecting against fraud; quality/safety control | N/A |
| Professional or Employment Information | Professional, educational, or employment-related information | Consumer interactions with our website and/or surveys, from conference organizers (with the Consumer's consent) | Customer communications; marketing | N/A |

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.

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 request unless we have been provided sufficient information for us to reasonably verify the identity of the requestor and the validity of the request.

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 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

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, and until such time as we change our practices by updating this Notice, will treat PI collected under this Notice as subject to a “do not sell” request.

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 CCPA, you may request that we delete your PI that we have collected directly from you and are maintaining. Our retention rights include, without limitation, 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.

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 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 e-mail 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.

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. You may also write to us at:

CyrusOne
Attention: CCPA Inquiry
2850 N. Harwood Street, Suite 2200
Dallas, Texas 75201