Nozomi Networks Data Privacy Program

1. Data Privacy Program: A Governance-Driven Commitment

At Nozomi Networks, privacy is a reflection of our core values: transparency, accountability, and trust. In an era where data protection is a top concern for organizations worldwide, we understand that our customers want clarity on how their data is handled.

Our privacy practices are publicly documented, and our Data Processing Agreement (DPA)—which governs data handling in connection with our services and software—is available on our website for review.

This document outlines our obligations and safeguards, helping customers meet their own compliance requirements with confidence.

2. Purpose, Nature, and Scope of Processing

Although Nozomi Networks does not process personal data as a core business activity, we do handle limited categories of customer data to fulfill service obligations. These activities are clearly defined and governed by contractual agreements and privacy regulations.

An overview of our data processing includes:

- **Purpose**: Data is processed to fulfill service requirements as described in agreements with clients.

- **Scope**:

  · Software login credentials and account management.

  · Diagnostic and performance data for support and troubleshooting.

  · Communications related to service and product usage.

- **Frequency**: These activities occur on an ongoing basis.

- **Categories of Data Processed**: We process limited personal data related to our clients' employees, including:

  · Names

  · Business email addresses

  · IP addresses

  · Job titles

  · Phone numbers

All data is handled with strict access controls, encryption, and purpose limitation to ensure it is used only as necessary and in accordance with applicable laws.

3. Privacy by Governance

Our Governance, Risk, and Compliance (GRC) team has implemented a comprehensive privacy policy that ensures oversight across all products and functions. This includes how we manage incidental personal data and how we align with global privacy regulations such as GDPR, CPRA, LGPD, and others.

3.1 Foundational Privacy Principles

Nozomi Networks' privacy framework is built on eight internationally recognized principles:

- Collection Limitation – Data is collected only for explicit, legitimate purposes and with informed consent where required.

- Data Quality – Personal data is kept accurate and up-to-date through regular audits.

- Purpose Specification – Data usage is strictly limited to the purposes disclosed at the time of collection.

- Use Limitation – Data is accessed only by authorized personnel and used solely for approved purposes.

- Security Safeguards – Technical and organizational measures, including encryption and incident response plans, protect data from unauthorized access.

- Openness – Privacy practices are transparent and accessible via public-facing platforms.

- Individual Participation – Individuals can access, correct, or delete their data, and exercise other rights under applicable laws.

- Accountability – A designated Data Protection Officer oversees compliance, supported by regular training and audits.

3.2 Governance and Oversight

The GRC team works cross-functionally with Legal Counsel to oversee the implementation and monitoring of the privacy program. Regular audits, stakeholder reporting, and continuous improvement initiatives ensure that privacy remains a dynamic and integral part of Nozomi Networks' operations.

4. Conclusion

Nozomi Networks' approach to privacy is built on governance, transparency, and respect for individual rights. Even though personal data processing is not central to our business model, we maintain a robust privacy posture to ensure compliance with global regulations and to meet the expectations of our customers. By embedding privacy into our organizational DNA, we reinforce our reputation as a responsible cybersecurity leader.

For further inquiries regarding this white paper on Nozomi Networks' data protection practices, please contact the compliance team at **compliance@nozominetworks.com**

Cybersecurity for OT, IoT
and Critical Infrastructure

Nozomi Networks protects the world's critical infrastructure from cyber threats. Our platform uniquely combines network and endpoint visibility, threat detection, and AI-powered analysis for faster, more effective incident response. Customers rely on us to minimize risk and complexity while maximizing operational resilience.