

DATA PRIVACY FRAMEWORK POLICY

Zebra Technologies Corporation, and its U.S. subsidiaries, ("**Zebra**") have chosen to voluntarily participate in the Data Privacy Framework. Zebra certifies its adherence to and compliance with the European Union ("**EU**")-U.S. Data Privacy Framework, including the United Kingdom ("**UK**") Extension, and the Switzerland ("**Swiss**")-U.S. Data Privacy Framework (collectively, the "**Data Privacy Framework**") and the Data Privacy Framework Principles, including the Supplemental Principles (collectively, the "**Principles**"), as set forth by the U.S. Department of Commerce. If there is any conflict between the terms of this Data Privacy Framework Policy ("**DPF Policy**") and the Principles, the Principles will govern. Zebra is eligible to participate in the Data Privacy Framework because it falls under the jurisdiction of the Federal Trade Commission ("**FTC**"). To learn more about the Data Privacy Framework program, the Principles, and to view Zebra's certification, please visit <https://www.dataprivacyframework.gov/s/>.

The DPF Policy outlines Zebra's general policy and practices for implementing the Principles, including: (a) the types of Personal Data (as defined below) Zebra receives from its customers, end users, partners, suppliers, and employees (including applicants, current, and former); (b) how that Personal Data is collected, used and retained; and (c) affected individuals' choices regarding the accuracy, retention and use of their Personal Data. In implementing the DPF Policy, Zebra has agreed to subject its compliance to the full breadth of regulatory enforcement of the FTC or any other statutory body empowered to enforce compliance with the Principles. Zebra shall only display its EU-U.S. Data Privacy Framework, including the UK Addendum, and Swiss-U.S. Data Privacy Framework certification marks or make other references to its compliance when it is in compliance with the Principles. Evidence of Zebra's participation in the Data Privacy Framework program may be found at <https://www.dataprivacyframework.gov/s/participant-search>. The DPF Policy applies to Zebra as well as Reflexis Systems Inc., a wholly owned subsidiary.

Zebra collects, uses, discloses, transfers, and otherwise processes data, including Personal Data, in several ways. Zebra uses the Personal Data collected for the following basic purposes: (1) to process transactions for the sale and support of Zebra's products and/or services; (2) to operate Zebra's business and to provide and support the products and services Zebra offers (including improving and personalizing); and (3) to send certain communications, including promotional communications. Zebra also collects, uses, and processes human resources data in the context of an employment relationship with its current employees, applicants and former employees, as further described herein.

Zebra shares Personal Data with consent or as necessary to complete any transaction or provide any product or service requested or authorized. Zebra also shares Personal Data with partners, suppliers, or third-party agents working with Zebra or on Zebra's behalf. The DPF Policy supplements, but does not replace, all other policies, practices, and procedures at Zebra, including any confidentiality agreements, privacy notices, or other agreements, as well as applicable laws. Zebra affirms that while it understands that certification to the Data Privacy Framework is voluntary, effective compliance is compulsory. The Principles apply to Zebra immediately upon certification. Zebra remains responsible and liable under the Principles if third party agents that it engages to process Personal Data on its behalf do so in a manner inconsistent with the Principles, unless Zebra proves that it is not responsible for the event giving rise to the damage. In any situation where Zebra does not maintain its Data Privacy Framework certification, or in the case the Data Privacy Framework gets revoked, replaced or invalidated, Zebra shall continue to adhere to the Principles and ensure that transfers under the DPF Policy are covered under a different adequacy decision as per Article 45 of the GDPR, or under another appropriate safeguard (e.g., binding

corporate rules, the applicable EU standard contractual clauses (SCC), or approved codes of conduct) as per Article 46 of the GDPR. Where necessary, Zebra shall work with third parties in good faith to implement such appropriate safeguards.

Definitions

“Personal Data” means information that is: (a) within the scope of the EU Data Protection Directive (95/46/EC) or General Data Protection Regulation (Regulation (EU) 2016/679) (**“GDPR”**), as to data subjects covered thereunder; (b) within the scope of the Swiss Federal Act on Data Protection as to Swiss data subjects; (c) within scope of the UK GDPR as defined by the UK Data Protection Act; (d) received in the U.S. from the EU, Switzerland, or the United Kingdom; and (e) recorded in any form.

“Sensitive Information” means Personal Data that reveals race, ethnic origin, sexual orientation, political opinions, religious or philosophical beliefs, trade union membership, or other information about an individual’s health and additionally under the Swiss-U.S. Data Privacy Framework ideological views or activities, information on social security measures or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

Part A - Application of the Data Privacy Framework Principles

Zebra collects a variety of information, including Personal Data, which Zebra maintains in accordance with the Principles as described below.

1. Notice

Zebra shall provide clear and conspicuous notice to inform individuals of the types of Personal Data it collects, uses, and retains and the types of third parties to which Zebra may disclose that Personal Data.

2. Choice

Zebra shall provide the individual with the choice and means for limiting the use and disclosure of their Personal Data. Subject to the limitations in the Principles, individuals have the right to choose (opt out) whether their Personal Data is: (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized. Individuals may send opt out requests to zebradataprivacy@zebra.com.

3. Onward Transfers

Zebra does not disclose Personal Data to third parties except in accordance with the Principles including as required by law, compelled by tribunals, courts, or government agencies, or as otherwise required, including to meet national security or law enforcement requirements. Zebra may use Personal Data for certain purposes in the manner described in Zebra’s Privacy Statement. Zebra shall ensure that any third party to which Zebra may disclose Personal Data will subscribe to the Principles or be subject to laws providing the same level of privacy protection as is required by the Principles, and agree in writing to provide an adequate level of privacy protection. In cases of onward transfer of Personal Data to third parties, Zebra is potentially liable for the acts or omissions of its third-party processors or sub-processors.

4. Data Security

Zebra shall take reasonable steps to protect the Personal Data from loss, misuse and unauthorized access, disclosure, alteration, and destruction. Zebra has implemented appropriate physical, electronic, and administrative procedures to safeguard and secure Personal Data. Zebra employs industry standard encryption for transmitting and storing data, as appropriate; however, Zebra cannot guarantee the security of information on or transmitted via the Internet.

5. Purpose Limitation and Data Integrity

Zebra agrees to process Personal Data consistent with the purposes for which it was collected or authorized by an individual. To the extent practical, Zebra shall take reasonable steps to ensure that Personal Data is reliable for its intended use, accurate, complete, and current. If an individual would like to access or update Personal Data, the individual may contact Zebra using the contact information below. Zebra will require individuals to properly verify their identity before it actions any requests.

6. Access

Individuals may access their Personal Data to correct, amend, or delete inaccurate information except: (a) where the burden or expense of providing access would be disproportionate to the risks to the privacy of the individual; (b) the Personal Data is required to be unaltered and/or retained for legitimate employment-related purposes; or (c) as otherwise restricted by law. Individuals may contact Zebra using the contact information below to request access to their Personal Data.

7. Accountability, Enforcement, and Recourse

Zebra provides mechanisms for assuring its compliance with the Principles. Zebra uses a self- assessment approach and, at least once a year, shall certify that the DPF Policy is accurate, comprehensive, prominently displayed, implemented, and in conformity with the Principles. Zebra shall monitor adherence to the Principles and address questions and concerns regarding its adherence. Personnel who violate Zebra's privacy policies may be subject to a disciplinary process. Individuals may raise any complaints by contacting Zebra using the contact information below. Zebra shall respond to an individual complaint within 45 days. If an issue cannot be resolved by Zebra's internal dispute resolution mechanism, Zebra has chosen JAMS to be its independent recourse mechanism for Data Privacy Framework disputes. Individuals may contact JAMS at <https://www.jamsadr.com/dpf-dispute-resolution> to address complaints at no cost to individuals. Zebra agrees to be bound by any decision of JAMS. More information about JAMS is available at <https://www.jamsadr.com/>.

In the event that Zebra or JAMS determines that Zebra did not comply with the DPF Policy, Zebra shall take appropriate steps to address any adverse effects and to promote future compliance. Under certain circumstances, individuals may invoke binding arbitration before the Data Privacy Framework Panel for residual claims not otherwise resolved. In the event Zebra becomes subject to an order for non-compliance with the Principles, Zebra shall make public any relevant sanctions or other findings. Any human resources data complaints can be addressed directly to the relevant EU Data Protection Authority, Swiss Federal Data Protection and Information Commissioner, or the UK's Information Commissioner's Office (collectively, "**Data Protection Authorities**"). Zebra shall cooperate with the Data Protection Authorities and comply with any final decision therefrom. You may contact Zebra using the contact information below to be directed to the relevant Data Protection Authority.

Limitation of the Application of the Principles

Adherence by Zebra to the Principles (and the DPF Policy) will be limited as explicitly permitted by the Principles: (a) to the extent necessary to meet national security, public interest, or law enforcement requirements; or (b) by statute, government regulation, or case law that create conflicting obligations or explicit authorizations, provided that, in exercising any such authorization, Zebra's non-adherence is limited to the extent necessary to meet the overriding legitimate interests. Where the option is allowable under the Principles and/or U.S. law, Zebra will opt for the higher protection where reasonably possible.

Part B - Adherence to the Data Privacy Framework Supplemental Principles

Zebra shall adhere to the following Supplemental Principles:

- 1. Sensitive Data.** Zebra may obtain Sensitive Information such as medical or health information, religious beliefs, or ethnic information. Certain portions of the Sensitive Information may not require affirmative consent because the processing is necessary: (a) to carry out Zebra's employment law obligations; (b) because it is in the vital interest of the individual or another person; (c) for the defense of legal claims; or (d) manifestly made public by the individual.
- 2. Journalistic Exceptions.** Zebra does not engage in journalistic activity.
- 3. Secondary Liability.** Zebra may, on behalf of others, transmit, route, switch, or cache information such that the secondary liability exception applies.
- 4. Performing Due Diligence and Conducting Audits.** Zebra may conduct due diligence, investigations, or audits on its behalf and such activities may require the processing of Personal Data without knowledge of the individual, to the extent required for legitimate interests of Zebra. If Zebra sells or divests all or part of its business, makes a transfer of assets, or otherwise becomes involved in a change of control transaction, or in the unlikely event of bankruptcy, Zebra may transfer Personal Data covered by the DPF Policy to one or more third parties as part of the transaction including the due diligence process.
- 5. The Role of Data Protection Authorities.** In connection with both human resources and non-human resources Personal Data, Zebra has committed to adhere to the Principles. Zebra shall cooperate with Data Protection Authorities as the recourse mechanism for complaints related to human resources data.
- 6. Self-Certification.** Zebra shall self-certify its Data Privacy Framework compliance in accordance with the U.S. Department of Commerce's protocols.
- 7. Verification.** Zebra shall verify its Data Privacy Framework compliance through self-assessment. Further, Zebra shall audit its compliance with the Data Privacy Framework. Zebra shall provide training regarding the DPF Policy to its personnel who may have access to Personal Data. Zebra shall retain its records on the implementation of the Data Privacy Framework and make them available as required.
- 8. Access.** Zebra understands that the right of access is fundamental to privacy protection. Zebra provides adequate mechanisms for access as stated herein.
- 9. Human Resources Data.** Zebra collects, uses, and processes human resources data in the context of an employment relationship with its current employees, applicants, and former employees.

Zebra shall respect the national laws of Switzerland, the UK, or the EU country where the information was collected or processed prior to transfer of Human resource data and shall further respect any conditions for or restrictions pertaining to transfer.

- 10. Obligatory Contracts for Onward Transfers.** Zebra shall ensure that a contract is in place between it and any third-party entity or agent that participates in an onward transfer of Personal Data. The contracts will specify that such Personal Data may only be processed for limited and specified purposes consistent with the consent provided by the individual and that the recipient shall provide the same level of protection as stated in the Principles.
- 11. Dispute Resolution and Enforcement.** Zebra meets its obligations for dispute resolution and enforcement by enrolling with JAMS and by cooperating with the FTC and the U.S. Department of Commerce.
- 12. Choice – Timing of Opt Out.** Zebra shall comply with the choice Principles as set forth above.
- 13. Travel Information.** Zebra may collect, use, and retain travel information including Personal Data, for individuals traveling on behalf of Zebra. Zebra shall comply with any special conditions for the handling of Sensitive Information.
- 14. Pharmaceutical and Medical Products.** This Principle does not apply to Zebra because Zebra is not engaged in any processing with respect to pharmaceutical or medical products or services.
- 15. Public Record and Publicly Available Information.** Zebra shall apply the Principles of Security, Data Integrity and Purpose Limitation, and Recourse, Enforcement and Liability, to Personal Data collected from publicly available sources and public records.
- 16. Access Requests by Public Authorities.** Zebra shall comply with lawful requests for information from law enforcement and national security agencies.

Zebra Contact Information

Any questions, inquiries, or complaints regarding the DPF Policy or Zebra's participation and compliance with the Data Privacy Framework should be directed to:

Cristen Kogl

zebradataprivacy@zebra.com

+1 (847) 464-8010

Complaints about Zebra's adherence to the Principles may also be sent directly to the FTC.

V6. October 3, 2023