



UNITED KINGDOM PRIVACY STATEMENT

This United Kingdom Privacy Statement supplements the [Zebra Privacy Policy](#) (“UK GDPR and DPA 2018 Addendum”) to the extent you use our website and the UK GDPR and DPA 2018 is applicable to you. Zebra is committed to UK GDPR and DPA 2018 compliance.

DEFINITIONS

As used in this UK GDPR and DPA 2018 Addendum, the following terms shall have the following meanings:

“DPA 2018” means the Data Protection 2018;

“UK GDPR” as defined by section 2 of the UK Data Protection, Privacy and Electronic Communications (Amendment etc.) (EU Exit) Regulations 2019), as amended, repealed, consolidated or replaced from time to time; and

“Personal Data”, “Data Subject”, “Process”, and “Processor” will each have the meaning given to them under Article 4 of the UK GDPR and the DPA 2018.

THE CONTROLLER, PROCESSOR AND PURPOSES OF THIS GDPR ADDENDUM

As a Data Controller and Data Processor of data, including Personal Data, we collect, process and use Personal Data fairly and lawfully.

Annex 1 (below) contains the list of Zebra entities in the United Kingdom that may collect and process your Personal Data.

We are focused on implementing the appropriate technical and organizational measures to ensure that Zebra meets the requirements of the UK GDPR and DPA 2018. Where the UK GDPR and DPA 2018 are applicable, we commit to follow all the requirements of the UK GDPR and DPA 2018, including to:

- Only Process your Personal Data in line with your instructions
- Honor your right to withdraw consent at any time
- Maintain the confidentiality of your Personal Data and ensure sufficient staff training on data protection
- Ensure appropriate security of, and access to, your Personal Data
- Provide relevant data retention and deletion policies
- Facilitating Data Subject’s rights and incident notifications
- Utilize Processors, sub-Processors and international data transfers in a UK GDPR and DPA 2018-compliant manner

THE PERSONAL DATA THAT ZEBRA COLLECTS AND USES

Zebra collects, uses and shares data for the purposes as set out in the [Zebra Privacy Policy](#).

PROCESSING BASIS

To process your Personal Data, we rely on the following legal basis:



- For the performance of a contract we have with you (such as if you purchase our products or services, we'll use your information to carry out our obligation to complete and administer your order)
- For compliance with a legal obligation to which we are subject (such as tax obligations and when we are obliged to comply with lawful requests from competent authorities such as law enforcement)
- For the purposes of our legitimate interests (such as tailoring your experience on our sites and for fraud detection), provided that such processing does not outweigh your rights and freedoms.

The processing may also be pursuant to other applicable legal basis for data processing, especially provisions set out by domestic law. To the extent that a legal ground described above would not apply to processing of your Personal Data by us, we will seek your consent for such specific purpose in accordance with applicable law.

PROCESSING SENSITIVE PERSONAL DATA

The UK GDPR and DPA 2018 treat some types of Personal Data as special categories of personal data. This includes information about racial or ethnic origin, sexual orientation, religious beliefs, trade union membership, health data, and criminal records. We will not collect or use these types of data without your consent unless the applicable law allows us to do. If we do, it will only be when it is necessary. In outline, these include:

- Processing relating to data about you that you have made public
- Processing being necessary for the purpose of establishing, making or defending legal claims

WEBSITE PROCESSORS

Zebra uses a select number of Website Processors or sub-Processors to provide customers with products and services, and to operate Zebra's business. Each Website Processor or sub-processor has been assessed for their ability to provide appropriately secure services and are themselves providing relevant assurances, policies and data processing agreements that we have entered into with them. Personal Data is processed for the purposes described in this Addendum and in our [Privacy Policy](#) and [Terms of Service](#).

Our current list of sub-processors for [zebra.com](#) are:

Name	Services
Zebra affiliates located in the United States of America	Applicable website data processing services as described in the Privacy Policy.
Zebra affiliates located in the European Economic Area	Applicable website data processing services as described in the Privacy Policy.
Zebra affiliates located outside of the EEA and	Applicable website data processing services as described in the Privacy Policy.



the United States of America	
Hero Digital, LLC	Marketing, automation and online chat services.
Oracle Corporation	Email subscription management and form processing services.
Salesforce.com, Inc.	Interface for contact management and task management.
Adobe, Inc	Website Analytics
OneTrust, LLC	Privacy Consent and Preference Management

INTERNATIONAL DATA TRANSFERS

For the purposes set out in the [Zebra Privacy Policy](#), your Personal Data may be transferred outside of the country in which it was collected to Zebra Technologies Corporation (“Zebra US”), the parent company of Zebra located in the United States, its subsidiaries, affiliates and third party service providers located in other jurisdictions.

We will ensure that all transfers are lawful and that there are appropriate legal and security arrangements, including implementing supplementary measures to achieve a level of protection equivalent to UK GDPR and DPA 2018.

We primarily rely on Standard Contractual Clauses made by the Secretary of State under the DPA 2018 (“SCCs”) to ensure the lawful transfer of Personal Data outside of the United Kingdom. Zebra as a group of companies has entered into an intra-group data transfer agreement, which incorporates the SCCs as the DPA 2018 transfer mechanism. This agreement ensures appropriate and suitable safeguards with Zebra US, Zebra UK, our subsidiaries, affiliates and third party service providers.

Our sub-processors commit to using approved methods to ensure the controlled transfer of data outside of the United Kingdom. Additionally, Zebra’s providers make strong commitments to Zebra related to limiting access to the data that is stored with them.

CHILDREN

Zebra products, services and websites are not for use by children under the age of 16 years and Zebra does not knowingly collect, store, share or use the Personal Data of children under the age of 16 years. If you are under the age of 16 years, please do not provide any Personal Data, even if prompted by our website to do so.

MARKETING

Where requested and lawful to do so, we may communicate with you about our products, services and solutions, subject to your consent where required. If you wish to unsubscribe from receiving marketing



communications, please visit <http://online.zebra.com/Preferences-enu> to manage communications preferences. As is common with most websites, Zebra gathers certain information and stores it in log files when you interact with Zebra's website. Zebra uses this information to personalize information presented to you, to monitor the effectiveness of our website-based marketing campaigns and to improve the functionality of the website. In such cases, we would treat such information in accordance with [Zebra's Privacy Policy](#).

SECURITY

Zebra has implemented a range of policies, procedures and controls to ensure Personal Data is secure. We are currently reviewing our policies to ensure they support the privacy requirements applicable to Personal Data under the UK GDPR and DPA 2018 and will review such policies on an ongoing basis. In assessing the appropriate level of security account shall be taken of the risks that are presented by the Processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to data transmitted, stored or otherwise Processed.

MINIMUM TECHNICAL AND ORGANIZATIONAL SECURITY MEASURES

Zebra has implemented and maintains at least the following minimal technical and organizational security measures to protect the Personal Data:

Server Operating Systems. Zebra infrastructure utilizes industry standard enterprise level Operating Systems which are regularly patched in accordance with the software vendors recommendation. All systems are protected with anti-virus, anti-malware and anti-ransomware software, as appropriate.

Businesses Continuity. Zebra maintains cloud-based systems hosted with third parties that provide business continuity/disaster recovery procedures.

Data Transmission. To prevent data from being read, copied, altered or removed without authorization, Zebra encrypts and/or password protects all transmissions containing Personal Data.

Encryption Technologies. Zebra uses AES and/or HTTPS encryption (also referred to as a SSL or TLS connection).

OPT-OUT, DATA SUBJECT ACCESS REQUESTS, RETENTION AND COMPLAINTS

Please visit the [Preference Center](#) page to understand the options available to you regarding unsubscribing to any communications you have subscribed to via our website. To invoke a Data Subject request under UK GDPR and DPA 2018 for access to and rectification or erasure of Personal Data or restriction of Processing or to object to Processing and rights to data portability, send an email detailing your specific request to privacy@zebra.com. We also retain Personal Data no longer than is necessary to carry out the purposes described in the [Zebra Privacy Policy](#). In considering how long to keep a particular category of Personal Data we will have regard to the purposes for which it is processed, and any purposes which continue to apply even when we have delivered a product or service (for example, because we need to keep records for audit purposes or in the event of a legal claim or threatened claims). Data Subjects have the right to lodge a complaint with the Information Commissioner if the Data Subject considers that the Processing of Personal Data relating to him or her infringes the UK GDPR or DPA 2018. Please refer to Annex 2 below to find the details for the Information Commissioner in the United Kingdom.

This Zebra UK GDPR and DPA 2018 Addendum is subject to change from time to time, so you should check it periodically.

This policy was last updated 23rd December 2020



ANNEX 1 - LIST OF ZEBRA DATA CONTROLLERS IN THE UNITED KINGDOM

Country	Controller
United Kingdom	Zebra Technologies Europe Limited Dukes Meadow, Millboard Road, Bourne End, Buckinghamshire SL8 5XF, United Kingdom

ANNEX 2 - DETAILS OF STATUTORY REGULATIONS IN THE UNITED KINGDOM

Country	Statutory Regulator
United Kingdom	ICO (Information Commissioner's Office) https://ico.org.uk/