Akamai Data Protection and Privacy Program

Akamai is trusted to make the Internet fast, intelligent, and secure. The company understands that how it processes personal data, and its commitment to the data protection rights of Internet users, customers and employees, is an important part of that trust. Akamai is committed to compliance with the laws of all countries in which it operates, including the data protection laws in the Americas, Europe and Asia.

Akamai's Data Protection and Privacy Program is aimed to protect the persona data that we process based on respect for the data subject's privacy concerns and by appropriate security safeguards. Akamai's Global Data Protection Office headed by Akamai's Chief Data Protection Officer is managing this program, and the company's senior leadership assist in ensuring that the program requirements are met. Our program has four main components:

Awareness

- Promote a culture of respect for, and thoughtful consideration of, privacy and personal data protection throughout Akamai.
- Communicate timely information about changes in privacy laws, regulations, and standards that affect our business.

Policies and Procedures

- Implement privacy protection policies and related operational procedures (in harmony
 with our <u>Information Security Compliance Program</u>) that ensure how we handle
 personal information complies with the law and meets our business commitments and
 needs.
 - Address program governance, accountability, incident response, and the handling of privacy related requests.
- Utilize privacy by design tools to timely raise, consider, and address privacy concerns at the early stage of service/product development.

Training

- Conduct trainings designed to support the Awareness and Policy and Procedures components and to provide employees and contractors with privacy-related information pertinent to their roles and responsibilities.
- Test the Awareness and Policy and Procedures compliance on a regular basis.

Accountability and Transparency

- Maintain accountability standards consistent with those articulated by the Organization for Economic Co-operation and Development (OECD) in its Guidelines Governing the Protection of Privacy and Transborder Flows of Personal Data revised in 2013.
- Communicate with our employees, clients, contractors, and the public about the program and our data protection and privacy practices.
- Establish, track, and report on key program performance indicators.

- Periodically verify privacy and data protection compliance through assessments and audits.
- Review program components and report to company leadership to ensure they are informed on progress and issues that need to be addressed. Our program is subject to ongoing review and revision as needed to better support program goals.