

Celona DPA Cover Sheet

Thank you for taking the time to review Celona's Data Processing Agreement ("**DPA**") that governs Celona's Products (as described at <https://www.celona.io/products> and defined at <https://www.celona.io/eua>). We recognize that sometimes attorneys, contract professionals, and/or procurement specialists are asked to review a vendor agreement without being provided any background of what is being procured or how the vendor's contract process works. We hope that this DPA Cover Sheet will be a useful resource as you review the DPA. This DPA Cover Sheet does not form part of your agreement with Celona whether or not attached to your agreement or the DPA. It is provided for reference purposes only, and does not create any warranties or obligations on the part of either party.

The Celona Products

For most customers, Celona provides an Edge appliance, Access Points, and physical SIM or eSIM cards. Celona also provides access to a web-based user interface called Orchestrator. The Edge appliance is a physical server delivered to the customer that runs the core private network software.

Celona delivers a highly secure, cloud-native hardware and software stack used by customers to deploy and operate private 4G and 5G cellular networks. The Celona End User Agreement available at <https://celona.io/EUA> ("**EUA**") provides the terms and conditions for use of Celona's private 4G and 5G cellular network service offering.

Celona enables enterprise devices to connect to private 4G and 5G cellular networks using SIM and electronic SIM ("**eSIM**") cards. These devices rarely include personal devices but more commonly are company issued devices like tablets, handheld barcode scanners, and other industrial devices such as autonomous mobile robots, autonomous guided vehicles, manufacturing robots, and security cameras ("**Connected Devices**").

Data Processed by Celona

When a customer administrator registers for the Products, Celona collects the administrator's personal data in the form of contact information, including name, email, company name, and company address. For security and audit purposes, Celona also collects the IP address of these administrators and other users when they log into Orchestrator.

The Products also include delivery of Access Points – wireless LTE or 5G radio devices installed in a customer's facility that communicate with the Connected Devices (similar to a WiFi access point). These Access Points are assigned an IP address which Celona processes to enable customers to– using Celona Orchestrator – manage the Access Points, and by extension, the devices connecting to the Access Points. Customers may also assign location details to an Access Point which is stored in Orchestrator. Celona does not collect real-time location information of users or devices on Access Points and does not create any historical location map based on Access Point location data.

Celona collects various device identifiers from Connected Devices such as IMSI, IMEI, SIM ID, ICCID, as well as IP address. While such data may be deemed personal when associated with a device used by an individual, because these Connected Devices are not ordinarily tied to an individual user, this data may not always be personal data. If the Connected Devices are tied to an individual, the data may constitute personal data. Further, because Celona does not have linked subscriber identifier information such as subscriber name (which is assigned by and/or maintained by cellular carriers), Celona would not be able to identify a particular subscriber using only the identifiers in its possession at any given point in time.

At your request for purposes of support and troubleshooting, we may also collect network packet information such as LTE control messages (part of the S1AP protocol), which may in certain cases include personal information if the Connected Device is a personal device. If you request that Celona collect packet information, the

information is collected from the Edge appliance (described above) and is limited only to the information passing through the Edge.

The Products do not require and Celona does not collect any sensitive or special categories of data as defined in data privacy laws.

How are the Products delivered?

The Edge appliance, Access Points, and any other hardware are shipped to the customer with all software pre-installed that is necessary to use the Products in accordance with the EUA. Celona Orchestrator is a multi-tenant environment hosted by AWS. Celona creates a customer specific account in Orchestrator and sends invitations by email to a customer's administrator to setup the account and subsequently invite other customer users who will assist in the deployment and management of the Products. Customers have the option of purchasing physical SIM cards or using eSIMs for their devices.

How does the DPA work?

The DPA contains the data privacy and data protection terms governing Celona's use of a customer's personal data. All customer orders are governed by the terms of the DPA and only one DPA is needed between customer and Celona. The DPA has been drafted specifically to address Celona's narrow use of personal data.

Can a customer attach their own vendor/security/privacy exhibits or change the DPA?

Celona's ability to provide a consistent and high level of its Products to all customers is dependent on its operating under standard terms and conditions. This includes terms related to our delivery model and data protection obligations. As a result, Celona is unable to agree to any additional or alternative contract documents that are not consistent with our standard terms. Our DPA sets forth the data privacy and data protection provisions under which we are able to provide our Products and contains industry-standard terms common in data processing agreements from many other SaaS companies. We monitor applicable laws and best practices and update our DPA accordingly.

For example, the DPA includes the following commitments:

- Celona will process Personal Data in accordance with the customer's documented instructions.
- Celona acts as a service provider and processor in connection with Personal Data.
- The purpose of the processing of Personal Data is to provide the Products.
- Celona will enter into an agreement with its Subprocessors with the same level of restrictions as in the Celona DPA. Celona will provide a list of Subprocessors and provide notice of new Subprocessors.
- Celona does not sell customer Personal Data as that term is defined in current data privacy laws.
- Celona will implement and maintain appropriate technical and organizational measures to protect Personal Data and ensure authorized personnel with access to Personal Data are subject to confidentiality obligations.
- Celona will have a valid cross-border data transfer mechanism in place as required by applicable law.
- Celona will delete Personal Data in accordance with the DPA.

Can you provide any additional information? What if we have questions?

Please see our [Security FAQ](#) for further details on our security practices.

We welcome any additional questions and are happy to discuss our privacy and security practices. Please reach out to us at privacy@celona.io.