

# PRIVACY

## Data and Privacy Policy

Alpha Wire and its subsidiaries and affiliates respect the privacy of their employees and Business Partners (defined below) and are committed to protecting data maintained by the company. Due to the global nature of Alpha Wire's business, transfers of Personal Data (defined below) across national boundaries may occur. As a result, Alpha Wire and its affiliated U.S. entities ("Alpha Wire") have adopted this Data Privacy Policy ("the Privacy Policy") and adhere to the Privacy Shield Principles published by the U.S. Department of Commerce, in agreement with the European Commission, with respect to Business Partner Personal Data transferred from the European Union to the United States of America regarding Business Partners within the European Union ("EU-Based Parties"). Additionally, Alpha Wire adheres to the Swiss-U.S. Privacy Shield principles with respect to Personal Data transferred from Switzerland to the United States of America regarding Alpha Wire employees and Business Partners within Switzerland ("Switzerland-Based Parties" and, together with EU-Based Parties, an "Affected Party" or the "Affected Parties").

This Policy applies to all Affected Party Personal Data received by Alpha Wire in the United States from the European Union ("EU") or Switzerland in any format, whether on-line or off-line. For the purpose of this Policy, "Personal Data" or "Personal Information" is data about an identified or identifiable Affected Party, received by Alpha Wire in the U.S. from the EU or Switzerland and recorded in any form. "Business Partners" refers to any organization, customer, prospect, partner, supplier or vendor, the Personal Data of which resides on the networks and servers of Alpha Wire. Personal Information of Alpha Wire Employees based in the EU is governed by a separate Human Resources Data Privacy Policy that is published to Alpha Wire employees, and is not governed by this Privacy Policy.

### **NOTICE**

Alpha Wire receives Personal Information in connection with the management and administration of its everyday business. Alpha Wire notifies Affected Parties about the purposes for which their Personal Information is collected and used. Alpha Wire will use the information for business operations, employee development (as it

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relates to Switzerland-Based Parties), administration and planning, or when required in the course of judicial or administrative proceedings, subject to all nondisclosure safeguards available. Below are listed the general categories of third parties with whom Alpha Wire may share this Personal Information. Notice to Affected Parties will be provided before Alpha Wire uses the information for purposes other than for which it was collected, or before it discloses the information to categories of third parties not specified in this policy.

### **CHOICE**

Alpha Wire gives its Affected Parties the opportunity to opt out from allowing Alpha Wire to disclose their Personal Information to a third parties other than those that are acting as agents of Alpha Wire or to use it for a purpose incompatible with the purpose for which it was originally collected or authorized. To exercise this opt out, an Affected Party should contact a human resources representative (if an employee) and the Alpha Wire General Counsel (if a Business Partner).

With respect to sensitive data (for example, political or religious beliefs, union membership, health matters), Alpha Wire will not share such information unless specifically authorized by the individual Affected Party.

### **TRANSFER TO THIRD PARTIES**

Alpha Wire may share Personal Data with third parties that provide certain services to Alpha Wire, including but not limited to, outside accountants and lawyers, consultants and service providers. Prior to transferring Personal Data within the Alpha Wire Group, Alpha Wire will ensure that the protection and transfer of such Personal Data complies with the Privacy Shield Principles or, in the case of Switzerland-Based Parties human resources data, the Swiss-U.S. Privacy Shield.

Alpha Wire may transfer Personal Data to a third party acting as an agent for Alpha Wire by having the third party enter into an agreement with Alpha Wire in which the third party promises to provide the same level of protection as required by the Privacy Shield Principles or, in the case of Switzerland-Based Parties human resources data, the Swiss-U.S. Privacy Shield. If the third party agent does not

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comply with its privacy obligations, Alpha Wire will take commercially reasonable steps to prevent or stop the use or disclosure of Personal Data. Alpha Wire acknowledges that it remains potentially liable under the Privacy Shield Principles for the actions of its agents.

Alpha Wire may also transfer Personal Data to a third party without your consent in response to requests by public authorities, including to meet national security or law enforcement requirements, including, for example, if we are required to do so by law, regulation, subpoena, court order or any other government, judicial or regulatory process.

### **SECURITY**

Alpha Wire takes reasonable measures to protect Personal Information from loss, misuse, and unauthorized access, disclosure, alteration or destruction. These measures include password protection for online information systems and restricted access to Personal Data processed by Alpha Wire personnel.

### **DATA INTEGRITY**

Alpha Wire does not process Personal Information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual. Alpha Wire will take reasonable steps to ensure that Personal Information is relevant for its intended use, accurate, complete and current.

### **ACCESS**

Upon request, Alpha Wire will provide Affected Parties with reasonable access to Personal Information that it holds about them and will take reasonable steps to permit the Affected Parties to correct, amend, or delete any Personal Information which is inaccurate or incomplete.

An Affected Party who wants to have access to his or her Personal Information should provide a written request to Alpha Wire.



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### RECOURSE, ENFORCEMENT AND LIABILITY

Annual internal compliance reviews of the Privacy Policy will take place as part of the certification process with the U.S. Department of Commerce. Alpha Wire is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

In compliance with the Privacy Shield Principles, Alpha Wire commits to resolve complaints about our collection or use of your personal information. EU and Swiss individuals with inquiries or complaints regarding this policy should first contact Alpha Wire at:

**By email:** [Belden.legal@belden.com](mailto:Belden.legal@belden.com)

If a complaint regarding Alpha Wire's use of Personal Information is raised by an Affected Party, Alpha Wire will investigate and try to resolve any dispute. Alpha Wire is further committed to refer unresolved Privacy Shield complaints to ICDR/AAA, and alternative dispute resolution provider in the United States. You may find more information about dispute resolution and how to file an arbitration claim with ICDR/AAA at <http://info.adr.org/privacysshield>. The services of ICDR/AAA are provided at no cost to you.

Under certain conditions, individuals may invoke binding arbitration for complaints regarding Privacy Shield compliance that are not previously resolved by other Privacy Shield mechanisms. Please visit <https://www.privacyshield.gov/article?id=ANNEX-I-introduction> for more information.

### AFFIRMATIVE STATEMENT

Alpha Wire complies with the EU-US Privacy Shield Principles and the Swiss-U.S.- Privacy Shield as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Alpha Wire has certified that it adheres to the



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Privacy Shield Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Privacy Shield program, and to view Alpha Wire's certification, please visit <http://www.privacyshield.gov>. Alpha Wire's Swiss-U.S. Privacy Shield application remains under review by the U.S. Department of Commerce.

### **AMENDMENT**

The Alpha Wire Privacy Policy may be amended from time to time in compliance with the requirements of the Privacy Shield Principles or, in the case of Switzerland-Based Parties human resources data, the Swiss-U.S. Privacy Shield program. Appropriate notice will be given concerning such amendments.