

1 PURPOSE

- 1.1 **About us:** Flextronics is a socially responsible and leading electronics manufacturing services provider delivering design, engineering and manufacturing services to aerospace and defense, automotive, computing, consumer, industrial, infrastructure, medical, energy and mobile original equipment manufacturers. Flextronics helps customers design, build, ship and service electronics and other products through a network of international facilities. This global presence provides design and engineering solutions combined with core electronics manufacturing and logistics services.
- 1.2 **Our commitment to data privacy:** These Standards set out our approach to and the commitment of the Flextronics Group and its Executive Management and Board of Directors to maintaining the highest standards of data privacy. These Standards for processing of Personal Data relate to the Personal Data of employees, contractors and business contacts or other individuals and must be followed by all members and employees of the Flextronics Group, and the Executive Management and Board of Directors will enforce such compliance. Failure to comply with these Standards, will lead to appropriate corrective and disciplinary actions.
- 1.3 **Objective of these Standards:** We shall handle all Personal Data in accordance with all applicable local Data Privacy laws, including the European Data Protection Directives, where applicable. Our compliance with these Standards will provide you with the protection required to enable us to process certain Personal Data within the Flextronics Group, including the transfer of that Personal Data outside of the EEA.

2 DEFINITIONS AND ABBREVIATIONS

Applicable Law means applicable national laws and regulations on data protection;

Business Contact Data means Personal Data relating to the business contacts at Flextronics Group's customers and suppliers;

Data Controller means the natural or legal person who alone or jointly with others determines the purposes and means of processing Personal Data;

Data Privacy means data protection as promulgated by European Data Protection Directives;

Data Processor means the natural or legal person which processes Personal Data on behalf of the Data Controller;

Data Protection Authority means any data protection authority who has approved these Standards;

Data Subject means an identified or identifiable natural person;

EEA means the European Economic Area which comprises the countries of the European Union plus Iceland, Liechtenstein and Norway;

Employee Personal Data means Personal Data relating to: (a) current, former and prospective employees; (b) current, former and prospective individual contractors; (c) volunteers; (d) agents; (e) temporary and casual workers; and (f) dependants, relatives, guardians and associates of the Data Subjects set out in (a) to (e) of the Flextronics Group;

European Data Protection Directives means the European Data Protection Directive (Directive 95/46/EC) and the Privacy and Electronic Communications Directive (Directive 2002/58/EC);

Flextronics Group means Flextronics International Ltd. incorporated in Singapore and located at 2 Changi South Lane, Singapore and any of its subsidiaries bound by these Standards;

Global Data Subject Rights Policy means the policy attached under Appendix 1 of these Standards;

Global Procedure for Raising and Handling Data Privacy Complaints means the policy attached under Appendix 2 of these Standards;

Personal Data means any information relating to an identified or identifiable natural person who can be identified directly or indirectly from that information, including but not limited to Employee Personal Data, Business Contact Data and Third Party Data;

Processing shall have the meaning set out in Article 2 of the Data Protection Directive and **process** and **processes** shall be construed accordingly;

Sensitive Personal Data means any Personal Data about a Data Subject's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data about health or sex life and criminal record data;

Standards means the terms set out in this document;

Third Party Data means Personal Data relating to third parties such as contact details about other individuals, information about complaints and CCTV images;

we, our and/or us means the Flextronics Group and its employees; and

you means a Data Subject whose Personal Data is processed by the Flextronics Group.

3 BACKGROUND

3.1 What is Data Privacy law?

Data Privacy (also known as "data protection") requires companies to process Personal Data in accordance with certain good practice principles. It also grants certain rights to individuals (for example, to access and correct their information). Data Privacy law governs the way in which Flextronics collects, stores and uses Personal Data about employees, contractors, business contacts and other individuals.

3.2 How does Data Privacy law impact Flextronics internationally?

Data Privacy law does not permit the international transfer of Personal Data to countries outside the EEA unless they ensure an adequate level of data privacy. Flextronics has taken proper steps to ensure that any transfer of Personal Data to countries outside the EEA is lawful. These Standards create a framework to comply with rules contained in the European Data Protection Directives and provide an adequate level of protection for Personal Data transferred to Flextronics Group companies outside the EEA. Flextronics Global Services (Manchester) Limited is the member of the Flextronics Group with delegated Data Privacy responsibilities and will be responsible for compliance with these Standards.

4 SCOPE

4.1 **Data covered by these Standards:** These Standards apply to our processing and the transfer by us of Personal Data which is subject to the European Data Protection Directives for which we are a Data Controller and to:

- (a) the processing of this Personal Data by a member of the Flextronics Group within the EEA;
- (b) the processing of this Personal Data in the EEA by a member of the Flextronics Group located outside the EEA;
- (c) the transfer of this Personal Data from within the EEA to outside the EEA by a member of the Flextronics Group to another member of the Flextronics Group and the subsequent processing or onward transfer of this Personal Data by that member to other members of the Flextronics Group.

The processing we carry out may be manual or automated. The types of Personal Data which are processed by us are Employee Personal Data, Business Contact Data and other Personal Data.

5 PRINCIPLES

Where Flextronics is a Data Controller, the following principles shall apply:

- 5.1 **We ensure that Personal Data is accurate and any processing is proportionate:** We will ensure that Personal Data is kept up to date and is accurate, adequate, relevant and not excessive for the purposes for which it is transferred and processed. Flextronics provides individuals with various methods to update and correct their Personal Data including online, using self-service systems and by contacting the HR Global Business Services or the appropriate person. We will not keep Personal Data for longer than is necessary for the purposes for which it is collected and processed unless it is required to be kept longer under Applicable Law. We will limit access to Personal Data to those employees who need access to fulfil their duties. We require our vendors and suppliers to follow a similar approach to Personal Data they access in providing services to Flextronics.
- 5.2 **We process Personal Data fairly and lawfully:** We will process Personal Data fairly and lawfully for specific legitimate purposes and will not process this in anyway that is

incompatible with these purposes. One or more of the conditions set out in Annex A or under Applicable Law will always be met.

- 5.3 **We shall keep you informed regarding our processing of your Personal Data:** These Standards shall be publicly available on the Flextronics public website and also available on the Flextronics internal Data Privacy Portal and upon written request to the Global Data Privacy Officer. Before your Personal Data is processed, we will let you know the identity of the Flextronics Group company that is the Data Controller. We will explain to you how we may use and disclose your Personal Data when your information is collected or, if that is not practicable, as soon as practicable thereafter.
- 5.4 **We shall provide you with rights of access, rectification, erasure and blocking:** You shall have the right at reasonable intervals (without excessive delay or expense) to request a copy of all Personal Data held about you by contacting HR Global Business Services or if you are an employee of Flextronics, by following the procedure set out in the Global Data Subject Rights Policy. We will provide you with access to such data as required by Applicable Law, unless we are permitted by Applicable Law to refuse or only partially comply with the request. We may, where permitted by Applicable Law, charge a fee for this. If you believe the data held about you is incomplete or inaccurate then we will work with you to rectify, block or erase the inaccuracy as required by Applicable Law. Further, you have, as provided by the European Data Protection Directives, the right to object, at any time, on compelling legitimate grounds, to the processing of data held about you, unless provided otherwise by national law. If we consider the request is justified under Applicable Law then we will cease processing the relevant data.
- 5.5 **We only make limited use of automated decision making:** There are requirements under the Data Protection Directives to ensure that no evaluation of, or decision about, an individual which significantly affects them can be based solely on automated processing of Personal Data unless measures are taken to protect the legitimate interests of individuals. For example, we make use of automated decision making in certain recruitment processes to test the aptitude of a particular candidate. However, this process will always be used in conjunction with other recruitment processes such as interviews and so are not conducted on a solely automated basis. If Flextronics makes significant decisions on a solely automated basis, it will, as required by Applicable Law, implement safeguards such as rights for individuals to put comments to Flextronics and have the decision considered by an individual.
- 5.6 **We recognise your right to object to direct marketing:** If we use your Personal Data for direct marketing, we will only do so in accordance with Applicable Law. If you object to our use of your Personal Data for direct marketing, you should contact the Global Data Privacy Officer, HR Global Business Services or using such other method as may be set out in the applicable marketing communication.
- 5.7 **We use appropriate security and confidentiality safeguards to protect your Personal Data:** We use appropriate technical, organisational, administrative and physical security measures to protect your Personal Data against unauthorised or unlawful processing and against accidental loss or destruction. Taking into account the state of the art and cost of implementation of these measures, we impose security appropriate to the risk represented by the processing and nature of the data to be protected.

- 5.8 **We take careful precautions with respect to the processing of Sensitive Personal Data:** We will only process your Sensitive Personal Data in accordance with Applicable Law including but not limited to the European Data Protection Directives. This may include the use of enhanced safeguards in relation to such Sensitive Personal Data, where necessary.
- 5.9 **We take appropriate measures with respect to our use of Data Processors:** Data Processors may include a member of the Flextronics Group or an external vendor who processes Personal Data on behalf of a member of the Flextronics Group. We shall ensure that if we use any Data Processors:
- (a) we will have a written contract in place with that Data Processor; and
 - (b) the written contract will state that the Data Processor:
 - (i) will only act on the instructions of the Data Controller; and
 - (ii) will have appropriate technical and organisational measures governing the processing to be carried out, including rules as to confidentiality.

We also have in place a comprehensive audit program to ensure Data Processors comply with the above measures (see Paragraph 6.2 below).

- 5.10 **We shall restrict the transfer of Personal Data:** In principle, international transfers of Personal Data from the EEA to a country or territory which has inadequate Data Privacy laws are not allowed unless adequate safeguards are in place in accordance with European Data Protection Directives, for example, by a member of the Flextronics Group (based outside the EEA) entering into these Standards or by putting in place contractual clauses (such as the EU Standard Contractual Clauses) which protect the Personal Data being transferred. We will only transfer Personal Data where such safeguards are in place in accordance with Applicable Law (for example, where the transfer of Personal Data is to an external vendor based outside the EEA). We will ensure that all transfers of Personal Data to external vendors based outside the EEA, respect the rules relating to EU processors (as set out in Paragraph 5.9 above) in addition to the rules on trans-border data flows.

6 HOW WE COMPLY WITH AND ENFORCE THE STANDARDS

- 6.1 **Our privacy officers:** We maintain a comprehensive network of privacy officers throughout the Flextronics Group who are responsible for Data Privacy within their country, region or segment, including compliance with these Standards. Each Data Privacy Liaison Officer reports into the relevant Regional Data Privacy Officer and, ultimately, to the Global Data Privacy Officer who directly reports to the Executive Board. The Flextronics Board comprises the Head of Legal, the Chief Financial Officer and Chief HR Officer and it reports to the Chief Executive. The Global Data Privacy Officer is ultimately responsible for the network of Regional Data Privacy Officers and Data Privacy Liaison Officers, the development and implementation of these Standards, responding to requests from the Data Protection Authorities, and co-operating with the Data Protection Authorities.
- 6.2 **Audit and compliance:** In addition, we have in place a comprehensive audit programme which includes regular internal privacy assessments covering all aspects of these

Standards. The results of such privacy assessments are provided to the Global Data Privacy Officer. If we identify any gaps in compliance with our Data Privacy requirements (including these Standards) work plans are put in place to rectify any gaps. We will provide copies of the applicable privacy assessments to the competent Data Protection Authority upon request but, where permitted by Applicable Law, provided that: (i) such information relates to compliance with these Standards; (ii) the information does not contain any commercially sensitive information about or belonging to Flextronics or any of its customers; (iii) the information does not contain any confidential information about or belonging to a third party; and (iv) disclosure of the information would not be contrary to Applicable Law.

6.3 **Training Programme:** We take Data Privacy very seriously and evidence this by providing mandatory Data Privacy training to all employees who have permanent or regular access to Personal Data, who are involved in the collection of Personal Data or in the development of tools used to process Personal Data in carrying out their duties. In addition to this, all employees are required to comply with all Flextronics policies and procedures which includes these Standards and are also required to confirm acknowledgement of the Flextronics Code of Conduct which sets out the Flextronics Group's commitment to Data Privacy and confidentiality.

6.4 **National legislation and these Standards:** We will ensure that if applicable data protection and privacy laws provide less protection than these Standards, these Standards will apply to our processing of Personal Data. However, if applicable data protection and privacy laws provide a higher protection, we will ensure that we will comply with the higher standard. Additionally, if a member of the Flextronics Group believes that a conflict with applicable data protection and privacy laws prevents it from fulfilling its duties under these Standards (including following the advice of a competent Data Protection Authority) that member entity will promptly notify the Global Data Privacy Officer or applicable Data Privacy Liaison Officer who will (in consultation with the Legal Department or the relevant Data Protection Authority, where necessary) responsibly decide what action to take.

Flextronics will ensure that where it has reason to believe that legislation applicable to it prevents it from fulfilling obligations under these Standards and has a substantial effect on its ability to comply with these Standards, it will promptly notify the Global Data Privacy Officer unless otherwise prohibited by a law enforcement body such as prohibition under criminal law to preserve the confidentiality of a law enforcement investigation.

Flextronics shall not be obliged to comply with these Standards, to the extent that compliance with the Standards is prevented by Applicable Law in the relevant jurisdiction or where there is a legitimate basis for this such as where this is necessary to safeguard national security or defence, for the prevention or detection of crime, for legal proceedings or where otherwise permitted by Applicable Law.

7 RELATIONSHIP WITH THE DATA PROTECTION AUTHORITIES

7.1 **Co-operation with the Data Protection Authorities:** The members of the Flextronics Group will co-operate with any Data Protection Authority and will provide assistance to each other in order to do so and to handle any request or complaint from a Data Subject or an investigation or inquiry. Any questions about our compliance with applicable laws and regulations should be addressed to the Global Data Privacy Officer using the contact details set out at the end of these Standards who will consult with the relevant Data Protection

Authority, where applicable. Members of the Flextronics Group will abide by the advice of the Data Protection Authorities on any issues regarding the interpretation of these Standards. Each Data Protection Authority is authorised to audit any member of the Flextronics Group who is bound by these Standards and advise on all matters related to these Standards. Such members of the Flextronics Group must respect the decisions of each local Data Protection Authority to the extent consistent with Applicable Law and due process and without waiving any defences or rights of appeal.

8 YOUR RIGHTS UNDER THESE STANDARDS

- 8.1 **Our liability to you:** The policies and procedures described in these Standards are in addition to any other remedies available under applicable data protection and privacy laws or provided under our other policies and procedures. Flextronics Global Services (Manchester) Limited has been nominated by the Flextronics Group as the company within the EEA with delegated responsibility for these Standards. Flextronics Global Services (Manchester) Limited will be responsible for and will take any action necessary to remedy any breach by a member of the Flextronics Group outside the EEA. This will include any sanction imposed or other remedy available under applicable data protection and privacy laws including compensation, where legally required. Flextronics Global Services (Manchester) Limited shall not be liable if it is able to show that the member of the Flextronics Group which is alleged to be in breach is not liable for the breach giving rise to damages or that no such breach took place. If it is held that these Standards have been breached, it shall be the responsibility of the claimant to demonstrate that he or she has suffered damage and establish facts which show it is likely that the damage has occurred as a result of such breach. To the maximum extent permitted by Applicable Law, Flextronics shall not be liable to an individual for punitive or exemplary damages, indirect loss, consequential loss or special damages, however arising or caused. Flextronics shall only be liable for damages which have been: (i) agreed by Flextronics under a settlement or compromise agreement with the relevant individual; or (ii) awarded against Flextronics by a non-appealable judgment, order or award of a competent court or tribunal.
- 8.2 **Your rights under these Standards:** If you believe a member of the Flextronics Group is in breach of these Standards, you may raise a complaint by contacting HR Global Business Services (please see Paragraph 10 below). If you are an employee, please also refer to the Global Procedure for Raising and Handling Data Privacy Complaints (a copy of which can be found on the Flextronics Data Privacy Portal). In relation to any rights that you have pursuant to legislation implementing the European Directive 95/46/EC, you can enforce the equivalent rights set out in these Standards (including those set out in Paragraph 8.1 above) as a third party beneficiary, in relation to transfers of Personal Data made by a member of the Flextronics Group or a Data Processor appointed by a member of the Flextronics Group located within the EEA to a country outside the EEA. This can be done by raising and bringing the issue of breach before the Data Protection Authorities or Courts either in the jurisdiction of England and Wales or in the jurisdiction of the member of the Flextronics Group that is at the origin of the transfer, at your option. The rights contained in this paragraph are in addition to and shall not prejudice any other rights or remedies that you may otherwise have at law including the right to compensation, if appropriate. Flextronics will not be deemed to have breached these Standards if it has observed the appropriate standard of care in the circumstances or otherwise acted in accordance with Applicable Law.

9 GENERAL

- 9.1 **Updates to these Standards:** From time to time we may amend these Standards (including to take account of modifications to the regulatory environment). Additional members of the Flextronics Group may become bound by the Standards and certain members of the Flextronics Group may no longer be bound by these Standards. Therefore we will ensure that a fully updated list of members of the Flextronics Group is available from the Global Data Privacy Officer and will provide this information to Data Subjects and the Data Protection Authorities on request. In addition, all amendments to the Standards will be subject to the approval of the Global Data Privacy Officer and reported to each Data Protection Authority at least annually with a brief explanation of the reasons justifying the update. Significant changes will be reported sooner and where necessary, the approval of the Data Protection Authority will be sought.

Once any amendments to the Standards are approved these will be communicated to all members of the Flextronics Group bound by these Standards and posted on the Flextronics public website and Data Privacy Portal on the Flextronics Group's intranet. Any revisions to the Standards shall include the date of the revision. We shall not make transfers of Personal Data covered by these Standards to a member of the Flextronics Group until such member is bound by these Standards or an alternative means of protection is in place.

- 9.2 **Effective Date of these Standards:** 1 July 2015.

10 CONTACT INFORMATION

- 10.1 **Contacts:** If you have any questions about these Standards, your rights under these Standards or any other privacy issues you can contact us using the details below.

Global Privacy Officer

Email: chiefprivacyofficer@flextronics.com

HR Global Business Services

Email: dataprivacy@flextronics.com

ANNEX A – Conditions to be met by Flextronics prior to the processing of Personal Data

At least one of the following conditions must be met prior to the processing of Personal Data by the Flextronics Group:

- The Data Subject gives his or her unambiguous consent;
- The processing is necessary for the performance of a contract to which the Data Subject is a party or for taking steps at the request of the Data Subject prior to entering into a contract;
- The processing is necessary for compliance with Flextronics' legal obligations, other than a contractual obligation;
- The processing is necessary to protect the vital interests of the Data Subject;
- The processing is necessary for the administration of justice, exercising functions of a public nature, or conferred on a person by any enactment;
- The processing is necessary to pursue the legitimate interests of Flextronics or by the third party or third parties to whom the Personal Data are disclosed, save where this prejudices the fundamental rights or freedoms or legitimate interests of the Data Subject; or
- In the case of Sensitive Personal Data, the Data Subject has given his or her explicit consent or one of the additional conditions set out below applies.

At least one of the following conditions must be met prior to the processing of Sensitive Personal Data by the Flextronics Group:

- The Data Subject has given his or her explicit consent;
- The processing is necessary for the purpose of any right or obligation imposed on Flextronics by law in connection with employment;
- The processing is necessary to protect the vital interest of the Data Subject where the Data Subject cannot give consent or Flextronics cannot be reasonably expected to obtain consent or where it is necessary to protect the vital interests of a third party and the Data Subject unreasonably withholds its consent;
- The processing is carried out in the course of its legitimate activities by any body or association which is not established or conducted for profit and exists for political, philosophical, religious or trade-union purposes; is carried out with appropriate safeguards for the rights and freedoms of Data Subjects; relates only to individuals who either are members of the body or association or have regular contact with it in connection with its purposes and does not involve disclosure of the Personal Data to a third party without the consent of the Data Subject;
- The information contained in the Personal Data has been made public as a result of steps deliberately taken by the Data Subject;
- The processing is necessary for the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings), obtaining legal advice or is otherwise necessary for the purposes of establishing, exercising or defending legal rights;
- The processing is necessary for the administration of justice, the exercise of any functions conferred on any person by or under an enactment or for the exercise of any functions of the Crown, a Minister of the Crown or a government department;
- The processing is necessary for medical purposes and is undertaken by a health professional or a person who in the circumstances owes a duty of confidentiality

which is equivalent to that which would arise if that person were a health professional;
or

- The processing is of Sensitive Personal Data consisting of information as to racial or ethnic origin, is necessary for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment between persons of different racial or ethnic origins, with a view to enabling such equality to be promoted or maintained and is carried out with appropriate safeguards for the rights and freedoms of Data Subjects.

APPENDIX 1

GLOBAL DATA SUBJECT RIGHTS POLICY

This document is proprietary and confidential property of Flextronics.

1.0 BACKGROUND / INTRODUCTION

1.1 Flextronics is committed to data privacy and the fair processing of Personal Data, including enabling individuals to exercise the rights in respect of their Personal Data to which they are entitled under applicable local laws.

1.2 In this Policy the following definition shall apply:

"Personal Data" means any information relating to an identified or identifiable natural person who can be identified directly or indirectly from that information.

2.0 PURPOSE

2.1 Data protection laws often grant individuals certain rights in respect of the collection and processing of their Personal Data by organisations, including by Flextronics. In its Data Privacy Standards, Flextronics commits to respect and enable individuals to exercise these rights.

2.2 This Policy supports this commitment to comply with the rights given to individuals by applicable local laws, including the right to access such Personal Data. It sets out the procedure that Flextronics will follow where an individual who has the right to do so under applicable local laws, seeks to exercise his or her rights in respect of the Personal Data held by Flextronics about that individual.

3.0 SCOPE

3.1 This Policy applies globally in respect of all individuals whose Personal Data is collected or processed by Flextronics, where such rights are granted to those individuals by locally applicable data protection laws.

4.0 RIGHT TO REQUEST ACCESS TO PERSONAL DATA**4.1 Scope of rights**

4.1.1 Where and to the extent granted by applicable local laws, individuals shall be entitled to request access to their Personal Data as described in paragraph 5.4 of the Data Privacy Standards.

4.1.2 Such rights may also include access to:

- a. confirmation of whether Personal Data about him / her is being held or processed by Flextronics, and the purpose of such processing;

- b. the categories of any such Personal Data and to whom it is disclosed; and
- c. such Personal Data in intelligible form and such information as Flextronics possesses regarding its source.

4.1.3 Flextronics shall respond to such requests in accordance with the procedure set out below.

4.2 Process for Requesting Personal Data

4.2.1 Where permitted by applicable local laws, individuals may at reasonable intervals make a request for access to Personal Data about him / her in writing as described in paragraph 5.4 of the Data Privacy Standards (an **Access Request**) to HR Global Business Services (**GBS**) via email at dataprivacy@flextronics.com.

4.2.2 Such Access Requests do not need to be presented in a particular format or reference data protection or data privacy laws. Access Requests should be made in writing unless applicable local laws permits oral requests.

4.2.3 Upon receipt of an Access Request, Flextronics will acknowledge receipt and may decline it (if one of the exemptions to subject access applies). It may also ask for the following in acknowledging and responding to the Access Request:

- a. proof of identification of the individual requesting the Personal Data;
- b. if the request for access does not provide sufficient direction to identify and locate relevant documents, GBS may ask the individual to clarify the request for access; and
- c. a fee to be paid for requesting the Personal Data in accordance with applicable local laws.

4.3 Procedure for responding to an Access Request

4.3.1 The relevant GBS operative (working with the Data Privacy Officer Network) shall progress an Access Request by arranging a search of all relevant Flextronics systems for the appropriate Personal Data.

4.3.2 Where the relevant GBS operative is unable to resolve an Access Request, or any Access Request is complex (involving, for example, third party individuals' Personal Data, Access Requests relating to existing or potential legal claims, or commercially sensitive information) the GBS operative shall refer the Access Request to the Global Data Privacy Officer to consider and respond.

4.3.3 Upon completion of such search, the relevant GBS operative shall prepare and respond to the relevant individual, providing such Personal Data and associated information to which the relevant

individual is entitled under applicable local laws. This will be subject to any exemptions under applicable local laws.

- 4.3.4 Where applicable local laws does not provide a specific timescale for such response, the relevant GBS operative will endeavour to respond to the Access Request within thirty (30) days from the date the request is received, together with any relevant clarificatory details.

5.0 OTHER RIGHTS IN RESPECT OF PERSONAL DATA

5.1 Where granted by applicable local laws, individuals shall be entitled to (i) request the rectification or erasure of Personal Data processed by Flextronics relating to that individual, or the blocking of such processing; or (ii) object to certain processing by Flextronics of Personal Data relating to that individual as described in paragraph 5.4 of the Data Privacy Standards.

5.2 Individuals may make such requests in writing by contacting GBS or the Global Data Privacy Officer as follows:

5.2.1 GBS

- via email at dataprivacy@flextronics.com

5.2.2 Global Data Privacy Officer

- via email at chiefprivacyofficer@flextronics.com.
- via telephone at +1 408 576 7000.

5.3 The Global Data Privacy Officer or relevant privacy officer, shall, in conjunction with the appropriate Flextronics business functions, consider and assess any such request.

5.4 Following such assessment, Flextronics shall seek to comply with such requests unless there are legitimate grounds on which to do otherwise.

6.0 COMPLAINTS OR DISPUTES

6.1 If any individual making a request under this Policy wishes to make a complaint in respect of Flextronics' response to such request, or otherwise disputes that such request has been handled in accordance with this Policy, he / she may raise such complaint or dispute as follows:

6.1.1 individuals who are employees, agency workers and other individual contractors of Flextronics should raise any such complaint or dispute in accordance with the Global Procedure for Raising and Handling Data Privacy Complaints; and

6.1.2 any other individuals should contact GBS (via email at dataprivacy@flextronics.com) in respect of any such complaint or dispute.

APPENDIX 2

GLOBAL PROCEDURE OF RAISING AND HANDLING DATA PRIVACY COMPLAINTS

This document is proprietary and confidential property of Flextronics.

1.0 BACKGROUND/INTRODUCTION

Flextronics is committed to data privacy and takes its obligations to protect Personal Data very seriously. Flextronics commits to comply with all applicable privacy and data protection laws in relation to Personal Data and upholding the Data Privacy Standards.

2.0 PURPOSE

The purpose of this Policy is to (a) set out the procedure to be followed by individuals raising complaints or concerns about data privacy matters within Flextronics, especially non-compliance with the Data Privacy Standards, the Global Privacy Policy Statement or the Manual for Processing Personal Data (**Data Privacy Complaint**); and (b) set out the procedure to be followed by Flextronics when a Data Privacy Complaint is received.

3.0 SCOPE

This Policy applies to any individual that has a Data Privacy Complaint.

4.0 DEFINITIONS

Personal Data: means any information relating to an identified or identifiable natural person who can be identified directly or indirectly from that information.

5.0 PROCEDURE FOR RAISING A DATA PRIVACY COMPLAINT

5.1 An individual may raise a Data Privacy Complaint by contacting HR Global Business Services (**GBS**) or the Global Data Privacy Officer through the following means:

5.1.1 GBS

- via email at dataprivacy@flextronics.com

5.1.2 Global Data Privacy Officer

- via email at chiefprivacyofficer@flextronics.com.
- via telephone at +1 408 576 7000.

6.0 PROCEDURE FOR HANDLING A DATA PRIVACY COMPLAINT

6.1 GBS

- 6.1.1 The Data Privacy Complaint will be handled by the GBS in the first instance.
- 6.1.2 If the Data Privacy Complaint cannot be dealt with by the GBS, the Data Privacy Complaint will be referred to the Data Privacy Officer Network for resolution. The Data Privacy Officer Network comprises the Global Data Privacy Officer and the privacy officers reporting to him / her.
- 6.1.3 The GBS/Data Privacy Officer Network may liaise with colleagues from other business and support groups within Flextronics to investigate the issues that have been raised in the Data Privacy Complaint.

6.2 Handling a Data Privacy Complaint

- 6.2.1 The GBS/Data Privacy Officer Network will aim to acknowledge receipt of each Data Privacy Complaint within seven days of receipt.
- 6.2.2 If the complainant fails to provide sufficient information, the GBS/Data Privacy Officer Network may request, within fourteen days of receiving the Data Privacy Complaint, supplementation of the complaint.

6.3 Resolution of the Data Privacy Complaint

- 6.3.1 The GBS/Data Privacy Officer Network may furnish to any person whose conduct is the subject of a Data Privacy Complaint ("**respondent**") a copy of, or information about, the complaint. Each respondent will have fourteen days from the date of receiving the Data Privacy Complaint to submit to the GBS/Data Privacy Officer Network a signed and dated written response.
- 6.3.2 The GBS/Data Privacy Officer Network will investigate each Data Privacy Complaint and will make a decision concerning each Data Privacy Complaint based on his or her investigation within 60 days of the complainant's submission, or 60 days after the submission of any supplemental information, whichever is later.
- 6.3.3 The GBS/Data Privacy Officer Network's decision will be in writing, and will be signed and dated by an authorized person.
- 6.3.4 The decision of the GBS/Data Privacy Officer Network will contain at least the following information: (a) a description of the Data Privacy Complaint, (b) a description of the respondent's response(s), if any, to the Data Privacy Complaint, and (c) a statement of the GBS/Data Privacy Officer Network's findings and conclusions.
- 6.3.5 The GBS/Data Privacy Officer Network shall arrange for a copy of the decision to be mailed to the complainant within three business days of the date of the decision.

7.0 OTHER RIGHTS

- 7.1 If an individual disputes Flextronics' response to a Data Privacy Complaint, the Global Data Privacy Officer will be notified who shall review the response and shall notify the individual of his / her decision. The Global Data Privacy Officer will respond to the individual within 6 months of the referral.
- 7.2 Individuals whose Personal Data is governed by the European Data Protection Directive, may complain to a European Data Protection Authority or seek remedies from a court of competent jurisdiction.