

BELDEN INC.

POLICY BULLETIN

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April 25, 2014
September 27, 2016
December 18, 2017

SUBJECT: PRIVACY POLICY

BELDEN INC.
DATA PRIVACY POLICY

Belden Inc. 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 Belden’s business, transfers of Personal Data (defined below) across national boundaries may occur. As a result, Belden Inc. and its affiliated U.S. entities (“Belden”) 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, Belden adheres to the Swiss-U.S. Privacy Shield principles with respect to Personal Data transferred from Switzerland to the United States of America regarding Belden 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 Belden 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 Belden 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 Belden. Personal Information of Belden Employees based in the EU is governed by a separate Human Resources Data Privacy Policy that is published to Belden employees, and is not governed by this Privacy Policy.

NOTICE

Belden receives Personal Information in connection with the management and administration of its everyday business. Belden notifies Affected Parties about the purposes for

which their Personal Information is collected and used. Belden will use the information for business operations, employee development (as it 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 Belden may share this Personal Information. Notice to Affected Parties will be provided before Belden 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

Belden gives its Affected Parties the opportunity to opt out from allowing Belden to disclose their Personal Information to a third parties other than those that are acting as agents of Belden 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 Belden General Counsel (if a Business Partner).

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

TRANSFER TO THIRD PARTIES

Belden may share Personal Data with third parties that provide certain services to Belden, including but not limited to, outside accountants and lawyers, consultants and service providers. Prior to transferring Personal Data within the Belden Group, Belden 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.

Belden may transfer Personal Data to a third party acting as an agent for Belden by having the third party enter into an agreement with Belden 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 comply with its privacy obligations, Belden will take commercially reasonable steps to prevent or stop the use or disclosure of Personal Data. Belden acknowledges that it remains potentially liable under the Privacy Shield Principles for the actions of its agents.

Belden 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

Belden 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 Belden personnel.

DATA INTEGRITY

Belden 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. Belden will take reasonable steps to ensure that Personal Information is relevant for its intended use, accurate, complete and current.

ACCESS

Upon request, Belden 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 Belden.

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. Belden is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission.

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

By mail:

Belden General Counsel
1 North Brentwood Boulevard, 15th Floor
St. Louis, Missouri 63105
USA

Facsimile: +1 314-854-8001

By email: belden.legal@belden.com

If a complaint regarding Belden's use of Personal Information is raised by an Affected Party, Belden will investigate and try to resolve any dispute. Belden 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

Belden 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. Belden has certified that it adheres to the 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 Belden's certification, please visit <http://www.privacyshield.gov>. Belden's Swiss-U.S. Privacy Shield application remains under review by the U.S. Department of Commerce.

To view a full list of Belden's subsidiaries and affiliates covered under Belden's Privacy Shield certification, please visit <http://www.privacyshield.gov/list>.

AMENDMENT

The Belden 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.

Prepared By:

/s/ Brian E. Anderson
Brian E. Anderson
General Counsel