

## Belden Privacy Policy

Belden Inc. and its subsidiaries and affiliates, including West Penn Wire, an unincorporated division of Belden Inc., (“**Belden**”, “**we**”, “**our**”, or “**us**”) respect your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. .

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

For more information about Belden, please see the “About Us” section of our Website at <https://www.belden.com/about>.

### Quick links

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Privacy Notice, then you can click on the relevant link below to jump to that section.

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### What personal information does Belden collect and why?

The personal information that we may collect about you broadly falls into the following categories:

- *Information that you provide voluntarily*

Certain parts of our websites and the websites of our affiliates and subsidiaries (“**Website**”) may ask you to provide personal information voluntarily.

Context	Types of Information	Primary Purpose for Collection and Use of Information
Account Registration	When you register an account we collect your name, address, e-mail address, company affiliation,	We have a legitimate interest in providing account related functionalities to our users, including notifying you about

	telephone number, and other similar information.	important product information and information concerning our professional relationship.
Employment	If you apply for a job posting, or become an employee, we collect information necessary to process your application or to retain you as an employee. This may include, among other things, your Social Security Number. Providing this information is required for employment.	We use information about current employees to perform our contract of employment, or the anticipation of a contract of employment with you. In some contexts, we are also required by law to collect information about our employees. We also have a legitimate interest in using your information to have efficient staffing and work force operations.
Mailing List	When you sign up for one of our mailing lists we collect your email address or postal address. As a customer, you will be given the opportunity, after registration, to notify us of your desire not to receive any further promotional e-mails from us.	We share information about our products and services with individuals that consent to receive such information. We also have a legitimate interest in sharing information about important changes to our Website, new services and special offers we think you will find valuable.
Partner Promotion	We collect information that you provide as part of a co-branded promotion with another company.	We have a legitimate interest in fulfilling our promotions.
Requests/Support	If you contact us for support, fill out and submit an online form, or request us to contact you, we collect your name, e-mail address, company affiliation, telephone number, state, and country, as well as any other content that you send to us, in order to contact you or process your request.	We have a legitimate interest in receiving and processing your requests, administering our business activities, and providing customer service.
Surveys Contests or	When you participate in a survey or contest, we collect information that you provide through the survey. If the survey is provided by a third party service provider, the third party's privacy policy applies to the collection, use, and disclosure of your information.  Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose additional information that may be requested. Information requested via surveys and contests may include additional demographic information.	We have a legitimate interest in understanding your opinions, and collecting information relevant to our organization.
Trade Shows & Industry Events	You may provide information to us at a trade show where Belden or a	We share information about our products and services with individuals that

	Belden subsidiary is represented, either by manually proving us with your contact information or by presenting your badge or other credential for scanning.	consent to receive such information. We also have a legitimate interest in sharing information about products, services and special offers we think you will find valuable.
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- *Information that we collect automatically*

When you visit our Website, we may collect certain information automatically from your device.

Specifically, the information we collect automatically may include information like your IP addresses, Internet domain names, the web browser and operating system used to access the Website, the files or pages visited, the time spent in each file or page, and the time and date of each visit. We use this information to improve our Website, for example by enhancing pages or features that are visited frequently, and on occasion we may share this information with our affiliates or other third party companies to provide them with an indication of the amount of interest in our Website for advertising purposes and to help us plan for technical improvements.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology" below.

- *Information that we obtain from third party sources*

From time to time, we may receive personal information about you from other sources, including third parties, business partners, our affiliates, or publicly available sources. The types of information we collect from third parties may include marketing information provided by trade shows and professional and other relevant information available to us on social networks about employment candidates. We use the information we receive from these third parties to allow us to make more informed decisions, improve the accuracy of records we hold, and occasionally to reach out to you regarding items or issues we believe interest you.

In addition to the purposes and uses described above, we use personal information in the following ways:

- to identify you when you visit our Website;
- to provide products and services;
- to improve our services and product offerings;
- to conduct analytics;
- to respond to inquiries related to support, employment opportunities, or other requests;
- to send marketing and promotional materials, including information relating to our products, services, sales, or promotions;
- for internal administrative purposes, as well as to manage our relationships;
- for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

### **Who does Belden share my personal information with?**

We may disclose your personal information to the following categories of recipients:

- to our **group companies, third party services providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website, conduct surveys, provide technical support, and process payments), or who otherwise process personal information for purposes that are described in this Privacy Notice or notified to you when we collect your personal information. A list of our current group companies is available in Belden Inc.'s most recent annual report on Form 10-K, filed with the United States Securities and Exchange Commission and available at <http://investor.belden.com/investor-relations>.
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, (iii) to protect your vital interests or those of any other person, or (iv) to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, including at the negotiation stage;
- to any **other person with your consent** to the disclosure.

## **Linked Sites**

It is important to note that our Website contains links to other websites and that those other websites will not follow the same privacy notice. This includes links from advertisers, content providers and trade partners who may use our logo and/or style as part of a co-branding agreement. These other websites may collect data from you that we would not and may use that data in ways that we would not.

## **Basis for processing personal information**

Although the sections above describe our primary purpose in collecting and using your personal information, in many situations we have more than one purpose. For example, if you complete an online purchase we may collect your information to perform our contract with you, but we also collect your information as we have a legitimate interest in maintaining your information after your transaction is complete so that we can quickly and easily respond to any questions about your order. As a result, our collection and processing of your information is based in different contexts upon your consent, our need to perform a contract, our obligations under law, and/or our legitimate interest in conducting our business.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

## **Cookies and similar tracking technology**

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use personal information about you, including to capture website analytics, to make our Website operate efficiently, and to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice at <http://www.belden.com/about/privacy/cookies>.

## **How do we keep your personal information secure?**

No method of transmission over the Internet, or method of electronic storage, is fully secure. While we use reasonable and appropriate technical and organizational measures to protect the personal information that we collect and process about you, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of a breach to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

## **International data transfers**

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, certain Website assets and our corporate headquarters are located in the United States, and our group companies and third party service providers and partners operate around the world. This means that when we collect your personal information we may process it in any of these countries. By submitting your personal information to us you agree to the transfer, storage and processing of your personal information in a country other than your country of residence including, but not necessarily limited to, the United States.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice. Belden is a party to the EU-US and Swiss-US Privacy Shield programs, and is in the process of initiating Binding Corporate Rules program. For further information about the Privacy Shield program, please see the heading "Privacy Shield Provisions" below.

## **Data retention**

Typically, we retain personal information we collect from you for the period necessary to fulfill the purposes outlined in this Privacy Notice (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements), unless a longer retention period is required or permitted by law. More detailed information on Belden's data retention programs may be provided upon receipt of an appropriate request.

## **Automated decision-making**

In some instances, our use of your personal information may result in automated decisions being taken that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without human review. For example, we may use automated decisions to screen résumés. If such automated decision making procedures are implemented, we will take appropriate measures to safeguard the rights and interests of individuals whose personal information is subject to automated decision-making.

When we make an automated decision about you, you have the right to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting us using the contact details provided under the "How to contact us" heading below.

## **Children and privacy**

We do not knowingly collect information from or about children age 13 and under.

## **Your data protection rights and choices**

Depending on your country or state of residence, you may have certain of the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us in a manner consistent with our Data Subject Access Rights policy (“**DSAR Policy**”). If required by law, upon request, we will grant you reasonable access to the personal information that we have about you, or grant your request to delete such information. You should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another one of our business purposes. In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights in a manner consistent with our DSAR Policy.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe,” “opt-out,” or similar link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), please contact us in a manner consistent with our DSAR Policy.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. In some cases, we may limit or deny your request to revoke consent if the law permits or requires us to do so, or if we are unable to adequately verify your identity.
- If you are in the European Union, you have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with our Data Subject Access Rights Policy and applicable data protection laws.

Our Data Subject Access Rights Policy and more detailed information on how to submit a request may be found at <http://www.belden.com/about/privacy>.

### **Information for California Residents**

California Civil Code Sections 1798.115(c), 1798.130(a)(5)(c), 1798.130(c), and 1798.140 indicate that organizations should disclose whether certain categories of personal information are collected, “sold” or transferred for an organization’s “business purpose”(as those terms are defined under California law). You can find a list of the categories of information that we collect and share [here](#). Please note that because this list is comprehensive it may refer to types of information that we collect and share about people other than yourself. If you would like more information concerning the categories of personal information (if any) we share with third parties or affiliates for those parties to use for direct marketing, you can submit a request using the contact details provided under the “[How to contact us](#)” heading below. We do not discriminate against California residents who exercise any of their rights described in this Privacy Notice.

### **Modifications to Our Privacy Notice**

Belden reserves the right to change our Privacy Notice at any time, except as may be prohibited by law. We will post revisions online and note the effective date of the latest version at the bottom of the Privacy Notice. To the extent that our policy changes in a material way, the Privacy Notice that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new Privacy Notice.

### **Privacy Shield Provisions**

As previously mentioned, Belden complies with the EU-US and Swiss-US Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. Belden has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. Accordingly, Belden is subject to the investigatory and enforcement powers of the United States Federal Trade Commission. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>

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 inquiries or complaints regarding our Privacy Shield policy should first contact us at [belden.privacy@belden.com](mailto:belden.privacy@belden.com)

We have further committed to refer unresolved Privacy Shield complaints to ICDR/AAA, an alternative dispute resolution provider located in the United States. You may find more information about dispute resolution and how to file and arbitration claim with ICDR/AAA at <https://go.adr.org/privacyshield.html>. 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.

As disclosed above, 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.

The U.S. subsidiaries of Belden Inc. that comply with Privacy Shield include the following: Coast Wire and Plastic Tech LLC; Garretcom, Inc.; Grass Valley USA LLC; Opterna International Corp., Prosoft Technology, Inc.; PPC Broadband, Inc.; Snell Advanced Media; Thinklogical, LLC; Tripwire, Inc.; and Tripwire International, Inc.

## How to Contact Us

If you have any questions or would like additional information about our privacy practices, please do not hesitate to contact us as provided below:

Belden Legal Department  
1 N. Brentwood Blvd., 15th Floor  
St. Louis, MO 63105  
Email: [belden.legal@belden.com](mailto:belden.legal@belden.com); [belden.privacy@belden.com](mailto:belden.privacy@belden.com)  
California residents may also call: [1-800-BELDEN1 \(1-800-235-3361\)](tel:1-800-BELDEN1)

For purposes of applicable data protection laws, the data controller of your personal information is Belden Inc.

Belden has appointed the law firm Shoosmiths as its external Data Protection Officer and should you have any questions or concerns for our DPO regarding the way in which your personal information has been used, please contact them at [belden.privacy@belden.com](mailto:belden.privacy@belden.com).

*This Privacy Policy was last revised in December 2019*