



# Privacy Policy for European Union Personal Data

**Effective 09/29/08**

This policy covers personal information that is subject to The European Community's Directive on Data Protection. ON Semiconductor Corporation and its subsidiaries ("ON") are committed to providing privacy protection of European Union ("EU") employee [1] Personal Data (as defined below).

As a result, ON declares its compliance with the Safe Harbor Privacy Principles developed by the Department of Commerce in coordination with the European Commission ("Principles") with respect to individually identifiable information that ON receives in the United States from the EU ("Personal Data"). As a Safe Harbor certified company, ON demonstrates the adequate privacy protection for Personal Data in accordance with the following Safe Harbor Principles: Notice, Choice, Onward Transfer, Security, Data Integrity, Access and Enforcement.

## Notice

ON collects, processes, and stores Personal Data electronically and in hard copy form. The primary purpose for collecting this data is to enable global management of Human Resources including providing an accurate payroll and payment to the employees.

When ON collects Personal Data from employees in the EU, it will inform them about the purposes for which it collects and uses the Personal Data, the types of third parties to which the data may be disclosed, and the choices and means, if any, ON offers to those employees for limiting the use and disclosure of their information. The notice will be provided in clear and conspicuous language when individuals are asked to provide the information, or as soon as is reasonably practicable thereafter, but in any event before ON uses the information for a purpose other than for which it was originally collected or before ON discloses it for the first time to a third party.

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[1]The references to "Employee" or "Employees" in this policy include only those current and former employees of ON subsidiaries (and any other ON facilities) that are subject to the EU Directive on Data Protection. ON respects the privacy rights of **all** of its employees worldwide. Each ON facility is to observe local requirements as expressed in applicable policy statements.



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## **Choice**

When required under the Principles, ON offers employees the opportunity to choose (opt-out) whether their Personal Data is (a) to be disclosed to a third party who is not an agent of ON or (b) to be used for a purpose that is incompatible with the purposes for which it was originally collected or subsequently authorized by the individual. If an Employee chooses to opt-out of providing Personal Data, they need to make a written request to their local Human Resources department for evaluation.

Sensitive information (i.e. information specifying medical or health conditions, racial or ethnic origins, religious beliefs, trade union membership, or information relating to the employee's sex life) will not be collected or transferred to a third party unless the employee consents to such collection or transfer (opt-in).

## **Onward Transfer**

ON will only disclose or share the Personal Data of an Employee with an outside entity or third party administrator if consistent with the principles of notice and choice, as specified above. ON obtains assurances from its third party agents that they will safeguard Personal Data consistently with this policy.

## **Security**

ON has taken reasonable precautions to protect Personal Data in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction.

## **Data Integrity**

ON will use Personal Data only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the employee. Reasonable measures will be taken to ensure that the information is reliable for its intended use, accurate, complete and current.

## **Access**

Upon request, ON grants employees reasonable access to their Personal Data held by ON, except where the burden or expense of providing access is disproportionate to the risks to the employee's privacy or where the rights of persons other than the employee would be violated. The employee can request correction, amendment, or deletion of that information which he or she demonstrates is inaccurate.



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## Enforcement

ON has deployed internal processes to monitor compliance with this policy. Any employee ON determines is in violation of this policy is subject to disciplinary action up to and including termination.

Any complaints or disputes regarding Personal data protection for ON Employees should be forwarded to the local HR representative.

Any complaints that cannot be resolved by the above should be referred to the ON Safe Harbor Privacy Contact, Colleen McKeown, Senior Vice President of Human Resources and Communications, at 5005 E McDowell Rd, Phoenix, AZ 85008; Telephone : (602) 244-7242.

Employees can also contact the Chief Compliance and Ethics Officer with concerns. Reports may be made anonymously or otherwise by using any of the following means:

- **Telephone:** Calling the Compliance and Ethics Hotline telephone number at 800-243-0186 from the U.S., Bermuda, or Puerto Rico; or, if you are outside of these areas, calling (i) AT&T country access code +800-243-0186 if you are dialing from an analog telephone; or (ii) AT&T country access code +##800-243-0186 if you are dialing from a digital phone; if you are outside the U.S. you may also call 602-244-3839
- **Mail:** Attn: G. Sonny Cave, Chief Compliance and Ethics Officer, ON Semiconductor Law Department, 5005 E McDowell Road M/D/ A700, Phoenix, AZ 85008 USA
- **Email:** [sonny.cave@onsemi.com](mailto:sonny.cave@onsemi.com)

ON agrees to cooperate with the EU Data Protection Authorities in addressing disputes that cannot be resolved directly.

**CHANGES TO THIS POLICY:** This policy may be amended from time to time, consistent with the requirements of the Safe Harbor. When any material changes are made, a notice will be posted along with the updated policy.