

GLOBAL DATA PRIVACY POLICY

Approved by: Senior Vice-President, General Counsel and Chief Legal Officer (October 2017)

1 Policy Statement

Avnet is committed to protecting the privacy and confidentiality of Personal Information about its employees, customers, business partners and other identifiable individuals. Avnet's policies, guidelines and actions support this commitment to protecting Personal Information. Each employee bears a personal responsibility for complying with this Policy in the fulfillment of their responsibilities at Avnet.

2 Scope

This Policy sets the minimum standard and shall guide all Avnet employees and Agents even if local law is less restrictive. Supplemental policies and practices will be developed as needed to meet the local legal or departmental requirements. Supplemental policies and practices may provide for more strict or specific privacy and protection standards than are set forth in this Policy.

3 Policy Details

3.1 Avnet respects the privacy of its employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment and recognizes the need for appropriate protection and management of Personal Information. Avnet is guided by the following principles in Processing Personal Information:

- Notice
- Choice
- Accountability for onward transfer
- Security
- Data integrity and purpose limitation
- Access
- Recourse, Enforcement and Liability

3.2 Notice. When collecting Personal Information directly from individuals, Avnet strives to provide clear and appropriate notice about the:

- Purposes for which it collects and uses their Personal Information,
- Types of non-Agent third parties to which Avnet may disclose that information, and
- Choices and means, if any, Avnet offers individuals for limiting the use and disclosure of their Personal Information.

3.3 Choice. Generally, Avnet offers individuals a choice regarding how we Process Personal Information, including the opportunity to choose to opt-out of further Processing or, in certain circumstances, to opt-in. However, explicit consent from individuals is not required when Processing Personal Information for:

- Purposes consistent with the purpose for which it was originally collected or subsequently authorized by the individual,
- Purposes necessary to carry out a transaction relationship,
- Purposes necessary to comply with legal requirements, or
- Disclosure to an Agent.

3.4 **Accountability for Onward Transfer.** In regard to the transfer of Personal Information to either an Agent or Controller, Avnet strives to take reasonable and appropriate steps to:

- Transfer such Personal Information only for specified purposes and limit the Agent or Controller's use of that information for those specified purposes,
- Obligate the Agent or Controller to provide at least the same level of privacy protection as is required by this Policy,
- Help ensure that the Agent or Controller effectively Processes the Personal Information in a manner consistent with its obligations under this Policy,
- Require the Agent or Controller to notify Avnet if the Agent or Controller determines it can no longer meet its obligation to provide the same level of protection as is required by this Policy, and
- Upon notice from the Agent or Controller, take further steps to help stop and remediate any unauthorized Processing.

3.5 **Security.** Avnet takes reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into due account the risks involved in the Processing and the nature of the Personal Information.

3.6 **Data Integrity and Purpose Limitation.** Avnet will only Process Personal Information in a way that is compatible with the purpose for which it has been collected or subsequently authorized by the individual. Avnet shall take steps to help ensure that Personal Information is accurate, reliable, current and relevant to its intended use.

3.7 **Access.** Avnet provides individuals with reasonable access to their Personal Information for purposes of correcting, amending or deleting that information where it is inaccurate or has been Processed in violation of the Avnet data privacy principles.

3.8 **Recourse, Enforcement and Liability.** Violation of this Policy by an employee or contractor of Avnet will result in appropriate discipline up to and including termination. Violation by an Agent, Controller or other third party of this Policy or Avnet's privacy requirements will result in the exercise of appropriate legal remedies available at law or in equity including termination for material breach of contract.

4 Purpose of Collecting and Use of Personal Information

Avnet may from time to time Process certain Personal Information from or about employees and third parties such as customers, business partners, vendors, service providers, suppliers, former employees and candidates for employment, including information recorded on various media as well as electronic data.

Avnet will use that Personal Information to provide customers, business partners, vendors, service partners and suppliers with information and services and to help Avnet personnel better understand the needs and interests of these customers, business partners, vendors, service partners and suppliers. Specifically, Avnet uses information to help complete a transaction or order, to facilitate communication, to market and sell products and services, to deliver products/services, to bill for purchased products/services, and to provide ongoing service and support. Occasionally Avnet personnel may use Personal Information to contact customers, business partners, vendors, service partners and suppliers to complete surveys that are used for marketing and quality assurance purposes.

Avnet may also share Personal Information with its business partners, vendors, service providers and suppliers to the extent needed to support the customers' business needs. Suppliers are required to keep confidential Personal Information received from Avnet and shall not use it for any purpose other than as originally intended or subsequently authorized or permitted.

Avnet also collects Human Resources Data in connection with administration of its Human Resources programs and functions and for the purpose of communicating with its employees. These programs and functions may include compensation and benefit programs, employee development planning and review, performance appraisals, training, business travel expense and tuition reimbursement, identification cards, access to Avnet facilities and computer networks, employee profiles, internal employee directories, Human

Resource record keeping, and other employment related purposes. Avnet also collects and uses Personal Information to consider candidates for employment opportunities within Avnet. Human Resources Data may be shared with third party vendors and service providers for the purpose of enabling the vendor or service provider to provide service and/or support to Avnet in connection with these Human Resources programs and functions. Avnet will not share Human Resources Data with third parties for non-employment related purposes. Avnet requires third parties receiving Personal Information to apply the same level of privacy protection as contained in this Policy and as required by applicable law.

5 Administration

5.1 Roles and Responsibilities. Responsibility for compliance with this Policy rests with the heads of the individual functions, business units and departments together with any individual employees collecting, using or otherwise Processing Personal Information. Business unit, function and department heads, in coordination with the Legal Department, are responsible for implementing further standards, guidelines and procedures that uphold this Policy, and for assigning day-to-day responsibilities for privacy protection to specific personnel for enforcement and monitoring.

5.2 Implementation. This Policy is meant to be implemented in conjunction with supplementary data privacy policies specific to a region, country or department, if required. These supplementary data privacy policies will account for differences in data protection requirements by jurisdiction or function and will specify individual roles and responsibilities. Avnet business units, functions or facilities will implement supplementary data privacy policies as required to be in compliance with applicable laws.

5.3 Interpretation. In the event of any conflict between this Policy and any supplemental data privacy policy, this Policy will supersede the supplemental data privacy policy to the extent that the supplemental data privacy policy is less restrictive. Local data privacy policies may provide for stricter data privacy and protection standards than are set forth in this Policy. In the event local data privacy law provides for stricter data privacy and protection than this Policy, the local data privacy law will supersede this Policy in that jurisdiction to the extent necessary to comply with stricter local law.

6 Definitions

“Agent” means any third party that collects and/or uses Personal Information provided by Avnet to perform tasks on behalf of and under the instructions of Avnet.

“Avnet” is Avnet, Inc. and all of its subsidiaries and affiliates globally.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the Processing of Personal Information.

“Human Resource Data” means Personal information concerning Avnet employees or prospective employees.

An “Identified” or “Identifiable” individual is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to the person's physical, physiological, mental, economic, cultural or social identity.

“Personal Information” is information or data about an “Identified” or “Identifiable” (see definition above) individual. It does not include information that is anonymous, aggregated or in circumstances where the individual is not readily identifiable.

“Policy” means this Global Data Privacy Policy, as revised.

“Processing” or “Process” means any operation or set of operations which is performed on Personal Information or on sets of Personal Information, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure

by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

7 References

- Avnet Code of Conduct
- Global Information Security Policy
- Privacy Disclosures at Avnet.com
- Supplemental local and departmental policies, procedures and standards on data privacy

8 Appendix

Policy Revision History

- October 2006
- July 2016

