

Privacy Policy

This policy applies to the collection, use, disclosure and protection of Personal Data, relating to customers of Richardson RFPD, Inc. and all of its subsidiaries and related entities ("Richardson RFPD"), suppliers of Richardson RFPD, and website users. This policy is effective as of September 30, 2016.

"Personal Data" means information pertaining to specific individuals, or by which specific individuals can be identified, including by name, identification number, address, or other personal characteristics or attributes. Personal Data does not include aggregated statistics, compilations, anonymous data, or other derivative data that does not, alone or with other data, identify a specific individual. "Data Subject" means an individual who is the subject of personal data.

Basic Principles

1. Richardson RFPD will not collect or maintain Personal Data that is not relevant to or not required for the conduct of Richardson RFPD business and will take reasonable steps to assure that Personal Data remains accurate.

Personal Data will be treated as confidential, and sufficient internal procedures and controls will be employed to prevent unauthorized access, disclosure, use, copying, modification, and destruction. Personal Data maintained by Richardson RFPD will not be used for purposes that are incompatible with the purposes for which it was collected. Personal Data will not be transferred to third parties, except as required for the conduct of Richardson RFPD business, and only to third parties who have agreed in writing to protect the privacy of Personal Data.

On-line Registration: If you decide to register with a Richardson RFPD web site, you will be asked to provide your name, company, country, email, and job type. Richardson RFPD uses the information that you provide to us during registration to enhance your experience. This may include presenting promotional offers online or via email with your consent or in accordance with applicable law, tailored to your previous purchases. Richardson RFPD does this to try and make your experience with us more productive and efficient.

Personal Data Accuracy and Completeness: Richardson RFPD endeavors to maintain Personal Data accurately and relies on its customers, suppliers, and other third persons who give Richardson RFPD Personal Data, to ensure that the Personal Data they provide to us is complete and accurate, and to notify us of updates and changes to Personal Data as required from time to time.

Updating Personal Data: If you would like to modify or delete the Personal Data held on your profile, please see My Profile or contact Customer Relations for further assistance.

EU persons may request access to their Personal Information under this policy to the full extent required by applicable law in the home country of the person making the request. Such persons may request the correction, amendment, or deletion of their Personal Information that is inaccurate or has been processed in violation of the Privacy Shield Principles. Richardson RFPD will reasonably fulfill such requests to the extent required by applicable law.

Opting Out Of Email Communications With Richardson RFPD: You can choose not to receive emails from Richardson RFPD at any time by simply sending an email, including your name and email address, to rfpdsupport@richardsonrfpd.com and we'll remove you from all mailings.

2. Richardson RFPD will treat all Personal Data in our possession as confidential, and maintain internal procedures and controls designed to prevent unauthorized or unlawful processing of data and against accidental loss or, destruction of, or damage to, Personal Data.

Security: Personal Data in Richardson RFPD's custody or control is protected by appropriate technology, policies and procedures designed to prevent unauthorized use, access, disclosure, modification, copying or destruction and to maintain the integrity, availability and privacy of Personal Data.

3. Richardson RFPD will only process Personal Data fairly and lawfully and will not use Personal Data in Richardson RFPD's possession for purposes that are incompatible with the purposes for which Richardson RFPD receives the Personal Data.

Richardson RFPD uses the Personal Data that Richardson RFPD collects about you: to process orders; to help us to improve our site and your online experience; to provide you with information about our products and services; for ordering, customer support, payment, processing and service purposes; to transact business with us; for credit checks, collections and related billing or credit purposes; and as otherwise allowed by law.

Online Ordering: If you place an order online, we need to know your name, email address, mailing address, credit card number, and the credit card's expiration date. We may also ask you for certain credit history and tax information. This allows us to process and fulfill your orders and keep you up-to-date on the status of your order.

Requests, Samples, Software Downloads: When you request a free sample offer, or a free software download, we may ask for your name, address, and email address so we can fulfill your request. In some cases, the collection of additional information may be required as part of the offer.

Contests, Surveys, & Online Polls: Richardson RFPD occasionally conducts surveys, polls or hold contests on Richardson RFPD sites. While these activities are voluntary, it often requires us to request information from you if you choose to participate. The poll results are gathered and displayed to other site users to show your peers' viewpoints on topical information. The contest information will be used to administer the contest and notify the contest winners, unless otherwise stated at the time of entry.

Emails, Including Special Offers & Site Updates: If you are registered with a Richardson RFPD site, Richardson RFPD will occasionally send you emails about various products and services that we feel may be of interest to you and/or about site features and changes that we feel you'll want to know about. You can choose not to receive email from Richardson RFPD at any time (see Opting Out of Email Communications above) and only Richardson RFPD (or agents working on behalf of Richardson RFPD) will send you these direct mailings.

Cookies: Richardson RFPD may also collect Personal Data concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are files that websites place on users' computers to identify the user and enhance the website experience. Internet browsers can generally be set to warn you if cookies are used and whether you wish to accept them. Turning off cookies will not prohibit you from using the Richardson RFPD web sites, it may however limit your use of the sites.

4. Richardson RFPD will not transfer Personal Data to third parties, except as required in our business, and provided those third parties preserve the confidentiality and maintain appropriate security of Personal Data and use it only for the purposes provided.

Third Parties: Richardson RFPD maintains collaborative relationships with vendors, subcontractors, strategic partners, and others who assist Richardson RFPD and our customers in the conduct of our respective businesses.

When Richardson RFPD engages such third-party service providers and when disclosure of Personal Information to such providers is necessary for the provision of such service, Richardson RFPD ensures that such providers protect Personal Information in a manner consistent with this Privacy Policy and, where applicable, is responsible for ensuring that such third parties process EU Personal Information in a manner consistent with the Privacy Shield Principles and consistent with applicable law.

5. Richardson RFPD will ensure that whenever Personal Data is transferred to foreign countries, it will remain adequately protected.

It is Richardson RFPD's policy not to transfer Personal Data to any entity, individual, or organization located in countries that do not provide an adequate level of data protection, unless:

- You have given your consent;
- The transfers are needed to enter into or perform a contract with you;
- The transfers are needed for the conclusion or performance of a contract concluded in your interest;
- The transfers are made pursuant to approved written contracts or a set of binding corporate rules which protect your rights; or
- The transfers are permitted under applicable law.

Richardson RFPD complies with the Privacy Shield Framework, as set forth by the U.S. Department of Commerce in consultation with the European Commission, regarding the collection, use and retention of Personal Information received from the European Union. As Richardson RFPD Electronics, Inc. is a U.S. company, it has voluntarily decided to comply with the EU – U.S. Privacy Shield Framework and is subject to the investigatory and enforcement powers of the Federal Trade Commission. Richardson RFPD annually certifies its adherence to the Privacy Shield Principles of notice; choice; accountability for onward transfer; security; data integrity and purpose limitation; access; and recourse, enforcement and liability. To learn more about the EU – U.S. Privacy Shield Framework,

<http://www.richardsonrfpd.com/Documents/privacypolicy.pdf>

please visit <https://www.privacyshield.gov/EU-US-Framework>. To view Richardson RFPD's certification, please visit <https://www.privacyshield.gov/list>.

Any EU person who is not satisfied with Richardson RFPD's compliance with the EU – U.S.

Privacy Shield may contact the Richardson RFPD to resolve such complaints at

compliance@RichardsonRFPD.com or by sending a letter to the addresses set forth in Section 6

below. If any EU person believes that such a complaint has not been resolved, he or she agrees first to try and settle the dispute by mediation, administered by the International Centre for Dispute Resolution under its Mediation Rules, before resorting to arbitration, litigation, or some other dispute resolution procedure. The rules governing these procedures and information regarding how to file a claim free of charge can be found here: <http://info.adr.org/safeharbor/>.

Any EU person who remains dissatisfied may contact his or her national Data Protection Authority in the country where the person resides. Richardson RFPD has agreed to cooperate and comply with appropriate EU Data Protection Authorities and the Department of Commerce in resolving such disputes. If an EU person remains dissatisfied and meets the pre-arbitration requirements of Annex I Part C of the EU – U.S. Privacy Shield Framework, the person may invoke binding arbitration pursuant to procedures in Annex I of the EU – U.S. Privacy Shield Framework Principles found here: <https://www.privacyshield.gov/EU-US-Framework>.

6. For any requests relating to your Personal Information, or if you have any questions about this Privacy Policy, please contact us at:

Arrow Electronics, Inc.,
9201 East Dry Creek Road
Centennial, CO 80112
(Attention: Legal Counsel)
compliance@arrow.com

German users can contact us at:

Arrow Central Europe GmbH
Frankfurter Straße 211
63263 Neu-Isenburg
Germany

(Attention: Legal Counsel)

compliance@arrow.com