

Anaren, Inc. – Privacy Policy

1. Introduction

- 1.1 We are Anaren, Inc. (referred to as **Anaren, we, us** and **our** in this Privacy Policy), a company incorporated in the state of Delaware and whose principal place of business is 1665 Scenic Avenue, Suite 250, Costa Mesa, California, 92626.
- 1.2 The information set out in this Privacy Policy is provided to individuals who are based in the European Union whose personal data we process (**you** or **your**) as data controller, in compliance with our obligations under Articles 13 and 14 of the General Data Protection Regulation 2016/679 (**GDPR**).
- 1.3 To make this information clear, we have divided the data we receive into the following groups and corresponding Schedules, where each of which refers to: the particular category of information we collect and retain; from where we obtain the information from; the purpose and legal basis of processing and to whom we will (if applicable) disclose the information:

Schedule 1 Data about individuals who apply for employment or work experience with us

Schedule 2 Data about our directors and staff, and former directors and staff and other individuals who spend time with us (such as consultants and secondees)

2. Data controller details

- 2.1 We are the data controller in relation to the processing of the personal information that you provide to us. Our contact details are as follows:
 - 2.1.1 Address: St Philips Point, Temple Row, Birmingham, West Midlands, B2 5AF.
 - 2.1.2 Telephone number: +(00) (314) 75388772.
 - 2.1.3 Email address: rene.beckers@ttm.com (please include “Personal Data Request” in your subject heading to ensure it receives the correct attention).

3. International transfers

We will not transfer personal data relating to you to a country which is outside the European Economic Area (**EEA**) unless:

- 3.1 the country or recipient is covered by an adequacy decision of the Commission under GDPR Article 45;
- 3.2 appropriate safeguards have been put in place which meet the requirements of GDPR Article 46 (for example using the European Commission's Standard Model Clauses for transfers of personal data outside the EEA); or
- 3.3 one of the derogations for specific situations under GDPR Article 49 is applicable to the transfer. These include (in summary):
 - 3.3.1 the transfer is necessary to perform, or to form, a contract to which we are a party:
 - 3.3.1.1 with you; or

- 3.3.1.2 with a third party where the contract is in your interests;
- 3.3.2 the transfer is necessary for the establishment, exercise or defence of legal claims;
- 3.3.3 you have provided your explicit consent to the transfer; or
- 3.3.4 the transfer is of a limited nature, and is necessary for the purpose of our compelling legitimate interests.

4. Retention of personal data

Our retention and deletion policy is enclosed.

5. Your rights in respect of your personal data

- 5.1 You have certain rights under existing data protection laws, including the right to (upon written request) access a copy of your personal data that we are processing. In accordance with the GDPR:
 - 5.1.1 you will have the following rights:
 - 5.1.1.1 **right to access:** the right to request certain information about, access to and copies of the personal information about you that we are holding (please note that you are entitled to request one copy of the personal information that we hold about you at no cost, but for any further copies, we reserve the right to charge a reasonable fee based on administration costs); and
 - 5.1.1.2 **right to rectification:** the right to have your personal information rectified if it is inaccurate or incomplete; and
 - 5.1.2 in certain circumstances, you will also have the following rights:
 - 5.1.2.1 **right to erasure/“right to be forgotten”:** the right to withdraw your consent to our processing of the data (if the legal basis for processing is based on your consent) and the right to request that we delete or erase your personal information from our systems (however, this will not apply if we are required to hold on to the information for compliance with any legal obligation or if we require the information to establish or defend any legal claim);
 - 5.1.2.2 **right to restriction of use of your information:** the right to stop us from using your personal information or limit the way in which we can use it;
 - 5.1.2.3 **right to data portability:** the right to request that we return any information you have provided in a structured, commonly used and machine-readable format, or that we send it directly to another company, where technically feasible; and
 - 5.1.2.4 **right to object:** the right to object to our use of your personal information including where we use it for our legitimate interests or for marketing purposes.
- 5.2 Please note that if you withdraw your consent to the use of your personal information for purposes set out in our Privacy Policy, we may not be able to carry out our contractual obligations to you or provide you with access to all or certain parts of our services.
- 5.3 If you consider our use of your personal information to be unlawful, you have the right to lodge a complaint with the UK’s supervisory authority, the Information Commissioner’s Office. Please see further information on their website: www.ico.org.uk.

6. **Automatic decision making**

We do not make decisions based solely on automated data processing, including profiling.

7. **Security**

7.1 We keep your information protected by taking appropriate technical and organisational measures to guard against unauthorised or unlawful processing, accidental loss, destruction or damage. For example:

7.1.1 where appropriate, data is encrypted when transiting on our system or stored on our databases;

7.1.2 we have implemented safeguards in relation to access and confidentiality in order to protect the information held within our systems; and

7.1.3 we frequently carry out risk assessments and audits to monitor and review threats and vulnerabilities to our systems to prevent fraud.

7.2 However, while we will do our best to protect your personal information, we cannot guarantee the security of your information which is transmitted via an internet or similar connection. It is important that all details of any username, password and/or other identification information created to access our servers are kept confidential by you and should not be disclosed to or shared with anyone.

8. **Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time, for example to keep it up to date, to implement minor technical adjustments and improvements or to comply with legal requirements. We will always update this Privacy Policy on our website, so please try to read it when you visit the website (the “last updated” reference tells you when we last updated our Privacy Policy).

Last updated 19 October 2018

Schedule 1
Data about individuals who apply for employment or work experience with us

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients:
<ul style="list-style-type: none"> • Contact details such as names, home and work addresses, landline/mobile phone or fax numbers, email addresses, previous addresses. 	<p>Our legitimate interest in processing such information for contacting individuals where we need to do so and for obtaining/verifying evidence of identity.</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> 1. recruitment agencies to communicate offer details (if any); 2. regulatory and law enforcement bodies, where required of us under applicable law or regulation; and 3. our service providers (such as data storage, administrative support and audit).
<ul style="list-style-type: none"> • Employment related history and qualifications information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary record. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role, or considering potential packages and offers.</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> 1. recruitment agencies to communicate offer details (if any); and 2. our service providers (such as data storage, administrative support and audit).
<ul style="list-style-type: none"> • Personal information such as professional and personal interests and languages spoken. 	<p>Our legitimate interest in processing such information for assessing their suitability for the role.</p>	
<ul style="list-style-type: none"> • Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. • Visa documentation (right to work in the relevant territory). 	<p>Our legitimate interest in processing such information for obtaining/verifying evidence of identity.</p> <p>Compliance with a legal obligation in order to confirm that the individual is entitled to work in the relevant territory and for the purpose of security and prevention of crime.</p>	<p>How we share information</p> <p>Please note that personal information we are holding about you may be shared with and processed by:</p> <ol style="list-style-type: none"> 1. regulatory and law enforcement bodies, where required of us under applicable law or regulation; and 2. our service providers (such as data storage,

What we collect

We may use your information for the following purposes, based on the following legal grounds:

Recipients:

administrative support and audit).

Schedule 2

Data about our directors and staff, consultants, secondees, those on work experience, temporary staff, former directors and staff, next of kin, spouses, beneficiaries

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
<ul style="list-style-type: none"> • Contact details (work) such as name, work address, landline/mobile phone or fax numbers, email address. • Contact details (personal) and other personal information such as home address, landline/mobile phone number, email address, previous addresses, emergency contact details, date of birth, marital status, next of kin, spouse, beneficiaries' names and contact details. 	<ul style="list-style-type: none"> • Necessary for the performance of our contract in our capacity as your employer. • Necessary to protect the vital interests of the individual concerned for the purposes of security and prevention of crime. • Our legitimate interest in processing such information (work contact details) for contacting individuals where we need to do so in the individual's capacity as employee, director or other member of staff. • Our legitimate interest in processing such information (personal contact details) for the purpose of contacting individuals where we need to do so in the individual's capacity as employee, director/shareholder or other member of staff, in order to keep appropriate employment records, for obtaining/verifying evidence of identity or for contacting next of kin, spouses and beneficiaries if the circumstances require (such as in an emergency). • Compliance with a legal obligation to comply with right to work legislation. 	<p>How we share information within Anaren</p> <ol style="list-style-type: none"> 1. We may share information about you with any company within Anaren (which includes TTM Technologies, Inc. and its subsidiaries) for the purposes set out in this Privacy Policy only (e.g. to help us provide employee administration services). <p>How we share information outside of Anaren</p> <ol style="list-style-type: none"> 2. Please note that personal information we are holding about you may be shared with and processed by: <ol style="list-style-type: none"> 2.1 our customers; 2.2 other professional advisers of our customers; 2.3 other parties and/or their professional advisers involved during the course of services provided to our customers; 2.4 regulators or other third parties for the purposes of
<p>“Special categories of information” such as:</p> <ul style="list-style-type: none"> • information about your religious beliefs; • information about your health, including any medical condition, health and sickness records such as details of any absences (other than holidays) from work including time on statutory parental leave and sick 	<p>We will use your particularly sensitive personal information in the following ways, and based on the following legal grounds:</p> <ul style="list-style-type: none"> • Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will use information about your physical or mental health, or disability status, to ensure your health and safety in the 	

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
<p>leave; and</p> <ul style="list-style-type: none"> health data relating to your, spouse, children and/or other family members when added to our private healthcare scheme. 	<p>workplace and to assess your fitness to work, to provide appropriate workplace adjustments, to monitor and manage sickness absence and to administer benefits including statutory maternity pay and statutory sick pay.</p> <ul style="list-style-type: none"> Pursuant to Schedule 1, Part 2(8) of the Data Protection Act 2018, we may use information about your race or national or ethnic origin, for the purpose of identifying or keeping under review the existence or absence of equality of opportunity or treatment. In accordance with Schedule 1, Part 4, S.35-36 of the Data Protection Act 2018, Anaren retains a policy document and records of processing of such information. Pursuant to Schedule 1, Part 1(1)(1) of the Data Protection Act 2018, we consider and process information about unspent convictions under our rights conferred by law in connection with employment (Exceptions Order to the Rehabilitation of Offenders Act 1974). In accordance with Schedule 1, Part 4, S.35-36 of the Data Protection Act 2018, Anaren retains a policy document and records of processing of such information. We will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws. We will also use information to administer benefits including statutory maternity pay, statutory sick pay and pensions. Pursuant to Article 9(2)(h) GDPR, we will use information provided in health questionnaires to assess the working capacity of our employees/other members of staff. We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of employment law. In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive or other personal data. If we do so, we will provide you with full details of the information that 	<p>monitoring and/or enforcing our compliance with any legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;</p> <p>2.5 credit reference and fraud prevention agencies;</p> <p>2.6 any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);</p> <p>2.7 other parties and/or their professional advisers involved in a matter where required as part of the conduct of the services;</p> <p>2.8 our own professional advisers and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;</p> <p>2.9 our service providers and agents (including their subcontractors) or third parties which process</p>

What we collect	We may use your information for the following purposes, based on the following legal grounds:	Recipients
	<p>we would like and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.</p>	<p>information on our behalf (e.g. internet service and platform providers, data storage providers, service providers, administrative support, third party payroll processors, audit providers and our bank);</p>
<ul style="list-style-type: none"> • Employment and performance related information such as position/title, date of birth, employment history and CV, references from previous employees, professional specialisms, education and qualifications, salary and benefits, disciplinary records, performance records, appraisals, performance feedback, interview notes, languages spoken, practising certificate details and caveats, professional indemnity information, working patterns (days worked and non-work days). 	<ul style="list-style-type: none"> • Necessary for the performance of the employment contract in order to keep appropriate employment records and carry out our contractual obligations as employer. • Our legitimate interest in processing such information in order to keep appropriate employment records, for assessing their continued suitability for their role and for planning progression. 	<p>2.10 third party providers of benefits (such as childcare vouchers, life insurers, pension providers);</p> <p>2.11 another organisation to whom we may transfer our agreement with you or if we sell or buy (or negotiate to sell or buy) our business or any of our assets (provided that adequate protections and safeguard are in place).</p>
<ul style="list-style-type: none"> • Payment and financial information such as bank details, transaction history, salary and benefits, life insurance, pension related information, tax-related information, National Insurance number, payroll documentation (P45 / P60 / P11D). 	<ul style="list-style-type: none"> • Necessary for the performance of the employment contract to pay or compensate the individual. • Our legitimate interest in processing such information in order to keep appropriate employment records and to allow the individual to receive pension and other benefits. • Consent in order to allow nominated family members or beneficiaries to receive benefits or insurance funds. 	<p>Please note that special categories of information will only be disclosed as follows (and provided you have consented):</p>
<ul style="list-style-type: none"> • Information contained in or provided to us as part of our recruitment or take on process such as details included in copy personal photographs and residential ID documents we receive. • Visa documentation (right to work in the 	<ul style="list-style-type: none"> • Our legitimate interest in processing such information for obtaining/verifying evidence of identity. • Compliance with a legal obligation in order to confirm that the individual is entitled to work in the relevant territory and for the purpose of security and prevention of crime. 	<p>2.12 health data may be provided to medical professionals or third party providers of benefits (such as life insurers).</p>

What we collect

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based on the following legal grounds:**

Recipients

relevant territory).