

EU/EEA Data Privacy Notice – Avnet Ethics Alertline

Protecting the security and privacy of your personal data is important to Avnet.

Avnet Business Services GmbH in its role of data controller is collecting and storing personal data. To ensure fair and transparent processing of your personal data and compliance with applicable laws on data protection, we provide you with the following information:

What personal data is collected and/or processed by Avnet?

The categories of personal data that Avnet is collecting through the Alertline and/or processing are:

- your name, if you choose to reveal your identity,
- your contact details, if you disclose them,
- your type of relationship with Avnet or one of the Avnet's affiliated companies (e.g. employee, contractor etc.) and
- the names and other personal data of persons whom you list in your report, if applicable.

If the data is not provided by you, what is the source from which your personal data originates?

Avnet collects the above-mentioned personal data from the reports submitted in the [Ethics Alertline](#).

How do we use your personal data?

Avnet uses the personal data we have about you for the following purposes:

Avnet's Ethics Alertline is used to receive, process, and manage reports concerning risks or suspected violations of the Avnet Code of Conduct, its policies or the law applicable to Avnet and all its affiliated companies. The processing of personal data within the system is based on the legitimate interest of our company in identifying, preventing, mitigating or ending substantiated risks and violations and thereby averting damage to Avnet and Avnet's affiliated companies, as well as any potential harm to employees and/or third parties, in accordance with Art. 6 (1) f of the GDPR. Moreover, the processing is necessary to fulfil a statutory obligation, in accordance with Art. 6 (1) c of the GDPR, in conjunction with the respective EU national law, in implementation of the EU Directive 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law, such as, but not limited to, § 10 of the German Whistleblower Protection Act (HinSchG).

Avnet's Ethics Alertline is provided by a specialised company, NAVEX, with registered address: 5885 Meadows Road, Suite 500, Lake Oswego, Oregon 97035, USA.

Incoming reports submitted in Avnet's Ethics Alertline are received by a small selection of authorised Avnet employees on a need-to-know basis and always handled confidentially. The Avnet team member of the Ethics and Compliance Office of the respective region evaluates the matter, assigns it to (an) appropriate investigator(s) (if needed) who, in some cases together with the member of the Ethics & Compliance team, perform any further investigation required by the specific case.

Does Avnet share your personal data with a third party or country?

While processing a report or conducting an investigation, it may be necessary to share reports with:

- other employees of Avnet in EU/EEA, or
- employees of other Avnet companies in other regions, e.g., if the reports refer to incidents in international Avnet companies.

Avnet may transfer your personal data to other Avnet companies, but only if and to the extent such transfer is strictly required for the purposes mentioned above.

Avnet may transfer personal data to courts, law enforcement authorities, regulators to the extent necessary to comply with the law or for the establishment, exercise or defense of legal claims, or to outside counsel.

Recipients of personal data may possibly be located in countries outside of the European Union /European Economic Area ("third countries"), in which applicable laws do not offer the same level of

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data protection as the laws of your home country. In such cases and unless permitted otherwise by applicable law, Avnet is committed to take measures in order to ensure the recipients in the third country provide an adequate level of protection. Avnet transfers and shares personal data with recipients in third countries, only if they have entered into EU Standard Contractual Clauses with Avnet or – in case of US recipients – if the recipient complies with the EU-U.S. Data Privacy Framework.

In connection with the operation of our websites and the services provided through our websites, Avnet works with service providers (so-called data processors), such as hosting or IT maintenance, which only act upon instructions of Avnet and are contractually bound to act in compliance with applicable data protection law and to provide appropriate technical and organizational security measures. The Avnet Ethics Alertline is hosted on a website operated by Navex Global Inc, that is a data processor of Avnet.

How long will Avnet store your personal data?

Personal data are retained for as long as necessary to clarify the situation and perform a final assessment or for as long as a legitimate interest exists on the part of the company or retention is required by law. After the report processing is concluded, the data will be erased in accordance with the respective valid statutory requirements. The current retention period for EMEA is 5 years from the time of the initial data collection unless there is need for further retention, as explained above.

Right of access to and rectification or erasure of personal data, restriction of processing, right to object to processing

Pursuant to GDPR, you and the persons named in the report have a right of access, rectification, erasure, restriction of processing, as well as a right of objection to processing of your personal data. If the right to object to the processing of the personal data is exercised, the necessity of the stored data for the examination of a report will be evaluated immediately. In some cases, the protection of the identity of the reporter can be a reason to not satisfy certain rights. Data that are no longer needed will be deleted.

In terms of how Avnet processes your exercised requests to the above-mentioned rights, please be aware that we take the issue of maintaining the confidentiality of reporters seriously and we will protect your identity or identity of others, involved in the reporting, as far as possible. You might be identifiable, due to the nature or circumstances of your concern, when exercising a right, especially if you submit a request via email.

Data Privacy Contact

Avnet's Data Protection Team provides support with any data privacy related questions, comments, concerns or complaints or in case a data subject wishes to exercise any of its data privacy related rights as mentioned above. Avnet's Data Protection Team may be contacted at: dataprotection@Avnet.eu

The Data Protection Officer of Avnet for Germany is:
Stefan Schindler
Stefan.Schindler@csr-legal.de

Avnet's Data Protection Team will use its best efforts to handle any requests or complaints brought to its attention. The data subject has got the right to approach the competent data protection authority with requests or complaints. A list of national data protection authorities is available can be found here: http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.