

## Global Privacy Statement

**Our Commitment to Protecting Your Privacy:** Your privacy is important to Tyco. We've developed this Global Privacy Statement that covers how Tyco and its affiliates worldwide collect, use, disclose, transfer and store your information. To make sure your personal data is secure, we communicate our information security and privacy guidelines to all Tyco employees and strictly enforce privacy safeguards within the company. In addition, we abide by the principles of the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce. We encourage you to read this Privacy Statement and to familiarize yourself with our privacy practices before submitting personal data, and please let us know if you have any questions.

**Safe Harbor Certification:** Information you provide may be transferred or accessed by Tyco affiliates or third party service providers we have retained to perform services on our behalf around the world as described in this Privacy Statement. Our corporate entity, Tyco International Management Company complies with the U.S.-EU Safe Harbor Framework and the U.S.-Swiss Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland. Tyco International Management Company has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view the details of Tyco's certification, please visit <http://www.export.gov/safeharbor/>

### Personal Data We Collect:

- "Personal data" is information that can be used to uniquely identify or contact an individual and includes a variety of information such as your name, mailing address, phone number, e-mail address and contact preferences.
- We collect your [personal data for various business purposes](#). We only collect the information we need to fulfill the business purpose.
- We may also ask you for specific identification information data, but only in limited circumstances such as when setting up an account with Tyco or when determining whether to extend commercial credit.
- Tyco may share your personal data [with other Tyco group companies](#) or third party service providers we have retained to perform services on our behalf and use it consistent with this Privacy Statement. We may also combine it with other data to provide and improve our products, services, content and advertising.
- In addition, we may also collect information relating to your use of our web sites through the use of various [technologies, including cookies](#).

### Notice and Choice:

- We will notify you about the types of personal data we collect, the purposes for which we collect such information and the types of third parties to which we disclose such data. We will also notify you if Tyco intends to use or disclose the information collected for a purpose other than that for which was originally collected.
- When we collect personal data from you, you may tell us that you do not want it used for further marketing contact. Alternatively, [you can tell us now](#).
- You may also [turn off cookies](#) in your web browser.

### **Uses of Your Personal Data:**

- We use your personal data for legitimate business purposes only including:
  - To fulfill your requests by us or by others involved in fulfilling your transaction requests;
  - To personalize your experience while you are on our sites, make navigation easier and for web site usage data;
  - To support products or services you have obtained from us;
  - For marketing purposes by Tyco and selected organizations if you have permitted such use;
  - To contact you for customer satisfaction surveys, market research or in connection with certain transactions;
  - In connection with a job application or inquiry;
  - To monitor or record call, chats and other interactions; and
  - To run our business operations and manage our risks, including protecting the rights and property of Tyco and others, legal and internal compliance, and audit and security purposes.

### **Collection and Use of Non-Personal Data:**

- We also collect “non-personal data”, which is information in a form that does not permit direct association with any specific individual. We may collect, use, transfer, and disclose non-personal data for any purpose.
- Aggregated data is considered non-personal data for the purposes of this Privacy Statement.
- If we combine non-personal data with personal data the combined information will be treated as personal data for as long as it remains combined.

### **Integrity and Retention of Personal Data:**

- Tyco makes it easy for you to keep your personal data accurate, complete, and up to date by providing you access to your data. Tyco will retain your personal data for the period necessary to fulfill the purposes described in this Privacy Statement unless a longer retention period is permitted by law.

### **Access to Your Personal Data:**

- You can help ensure your online contact information and preferences are accurate, complete and up to date by logging in to your account with us.
- For other personal data we make good faith efforts to provide you with access so you can request that we correct the data if it is inaccurate or delete the data if Tyco is not required to retain it by law or for legitimate business purposes.
- We may decline to process requests that are unreasonably repetitive, require disproportionate technical effort, violate the privacy of others, or for which access is not otherwise required by local law.
- If you wish to make requests to access, correct, or delete personal data please contact the Chief Privacy Officer, Nora Kurzova, at [tycocommunications@tyco.com](mailto:tycocommunications@tyco.com).

### **Transfers to Others:**

- **Tyco Affiliates and Authorized Third Parties:**
  - Tyco may share your personal data with other Tyco affiliates worldwide or authorized third party service providers who process your personal data for Tyco for the purposes described in this Privacy Statement. For example, Tyco shares your personal data with companies who provide services such as information processing, fulfilling customer orders, delivering products to you, managing and enhancing customer data, providing customer services, performing compliance reviews, assessing your interest in our products and services, and conducting customer research or satisfaction surveys.
  - Personal data will not be shared with third parties for their marketing purposes.
  - These companies may be located wherever Tyco operates and are not permitted to use your personal information for other purposes, are obligated to act consistently with this Privacy Statement and must use appropriate security measures to protect your information.

## **International transfers:**

- Information you provide may be transferred or accessed by companies around the world as described in this Privacy Statement.
- Tyco abides by the Safe Harbor principles agreed to by the United States Department of Commerce and the European Commission regarding the collection, use and handling of the personal data transferred to the United States with respect to our employees, customers, suppliers and business partners located in the European Economic Area. Use this link to learn more about the [U.S. Department of Commerce Safe Harbor Program](#).

## **Others**

- Tyco may disclose personal data if necessary by law such as litigation, or request or subpoena from public and governmental authorities within or outside your country of residence. We may also disclose information about you if we determine that for purposes of national security, law enforcement, legal compliance, or other issues of public importance, disclosure is necessary or appropriate.
- Tyco may disclose information about you if we determine that disclosure is reasonably necessary to enforce our terms and conditions, or other contractual or legal rights, or to protect our operations or employees. Additionally, we may disclose your personal data to a third party if we file bankruptcy, or there is a transfer of assets or ownership in connection with proposed or consummated corporate reorganizations, such as merger, acquisition, sale or other disposition of business units.

## **Security:**

- There are always risks with providing personal data, whether in person, by phone, via the Internet or otherwise, and no technology is completely safe or “hacker” proof. Tyco takes appropriate technical, administrative and organizational informational security measures to prevent and minimize such risks.
- Such measures include, where appropriate, the use of firewalls, secure server facilities, encryption, implementing proper access rights management systems and processes, careful selection of processors and other technically reasonable measures to provide appropriate protection for your personal data against unauthorized access or disclosure. Where appropriate, we may also take backup copies and use other such measures to prevent accidental damage or destruction to your personal data. If a particular part of a Tyco website supports online transactions, we will use an industry standard security measure, such as the one available through “Secure Sockets Layer” (“SSL”), to protect the confidentiality and security of online transactions.
- Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. You are responsible to inform us immediately if you become aware of any unauthorized use of your information or password.

## **Cookies and Other Technologies:**

- When you visit our websites, our server may attach a small text file to your hard drive – a cookie. Typically they enable collection of certain information about your computer including your Internet protocol (IP) address, your computer's operating system, your browser type and the address of any referring sites. Cookies help us deliver a better website experience to you. Your unique cookie tells us that it is you whenever you revisit our site, so we can recall where you have previously been on our site, eliminate the need for you to enter your password frequently during a visit and what, if anything, you have in your shopping cart if you do not finish a transaction in a single visit. Cookies are also used for website traffic analysis and anonymous demographic profiling so that we may improve our services.
- Tyco may also use web beacons (also known as “clear gifs” or “pixel tags”) in connection with some websites. However, we do not use them to identify individual users personally. Web beacons are tiny graphics embedded on a website to count visitors to a website, to access certain cookies and/or to help us measure the effectiveness of particular content. We may also include web beacons in marketing e-mail messages or our newsletters in order to determine whether messages have been opened and links contained within clicked on. Again this information is used to improve our services.
- You have a choice with respect to cookies. By modifying your Internet browser preferences, you have the ability to accept all cookies, to be notified when a cookie is set, or to reject all cookies. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site. Please understand that if cookies are turned off, you may not be able to view certain parts of a Tyco site that may enhance your visit. If you turn off cookies, the web beacon will no longer be able to track your specific activity. The web beacon may, however continue to collect information of visits from your IP address, but such information will no longer be unique. Please note that some of our business partners whose content is linked to a Tyco site may also use cookies or web beacons. However, we have no access to or control over these cookies.

For more information, please read [Tyco's Cookie Policy](#) [link]

## **Links to Non-Tyco Sites and Services:**

- Tyco websites, products and services may contain links to third-party websites, products and services. Our products and services may also offer products or services from third parties, including our authorized business partners. Information collected by third parties is governed by their privacy practices. We recommend that you read the privacy policies of those third parties as Tyco is not responsible for their privacy practices or the content of their websites.

## **Children:**

- We do not knowingly collect any information from children under 13. If we discover that we have collected such information we delete the information as soon as we can.

**Privacy Questions:**

- If you have a question about this Privacy Statement or Tyco's handling of your information you can contact Nora Kurzova, Tyco's Chief Privacy Officer at [tycocommunications@tyco.com](mailto:tycocommunications@tyco.com).

**Changes to our Privacy Statement:**

- Tyco may update this Privacy Statement from time to time. When we change the statement in a material way, a notice will be posted on our website along with the updated Privacy Statement. You are bound by any such revisions and should, therefore, periodically visit this Privacy Statement to review the most current version.