



## EXTERNAL PRIVACY NOTICE

**Data controller:** America Fujikura Ltd.

America Fujikura Ltd. ("AFL") offers fiber optic cable, transmission and substation accessories, outside plant equipment, connectors, fusion splicers, test and inspection equipment, and training services.

At AFL we understand that your privacy is important. We will treat any personal information you provide us as confidential and will only use and record information in accordance with Data Protection laws. We are committed to being transparent about how we collect and use data and promise to not sell any information about you to any other party.

This Privacy Notice explains how your Personal Information is handled in connection with all services we provide.

Any reference here to "the Organization" includes AFL as well as all and any subsidiary companies in the UK and around the world.

### **What information do we collect?**

AFL and its subsidiaries may collect and process data online, face to face, over the phone, in writing and through email communications. We may collect and process the following:

- Generalized information
- Name, Address, Email, Phone, Company
- Product interests
- Browsing history
- Session ID
- Publically available information from social posts when sharing

AFL may collect this information in a variety of ways. Information is usually collected directly from you or from a third party. For example,

- Location is collected via IP address via third party (IpGeo).
- A form completed on website
- At a trade show
- In a feedback survey

Unless required by law, the organization seeks information from third parties with your consent only.

If we ever collect special categories of data, we will ensure we satisfy one of ten conditions under Article 9 of the GDPR to process this type of data. We only collect sensitive data that is required to fulfil the purpose of the processing undertaken.

Special categories of data, if ever provided to AFL, would include:

- race;
- ethnic origin;
- political views;
- religious beliefs;
- trade union membership;
- genetics;
- biometrics (where used for ID purposes);
- health;
- philosophical beliefs
- sex life; or
- sexual orientation.

## EXTERNAL PRIVACY NOTICE

### **How we use your information and our legal basis?**

We'll only use your information where we have your consent or we have another lawful reason for using it. We only use the data that is collected to fulfil the intended purpose. These reasons include where we:

- Provide localized content based on country
- Inferring product interest
- Follow on sales inquiry
- Lead generation
- Email newsletter
- Service requests
- Technical support

We use your information to provide a service you requested or where we are contractually required to do so; to send marketing communications to you (where you have agreed or where there is a legitimate interest for you to receive an update) and/or for administrative purposes. Where we send you marketing material, we will give you an option to opt-out.

We use the following lawful bases to process personal data;

- Consent
- Contractual requirement
- Legal obligation
- Legitimate interest

### **Who has access to your data?**

Your information may be shared internally in order to process or fulfil a request or provide a service. The organization shares your data with third parties where it is required to do so by law or there is an identified legitimate reason to do so. We may also use a number of software and applications which are provided by third party processors, however, we ensure that these are: vetted; provide adequate protection to your personal data; and that there is a written contract in place for safeguarding.

Should there be a specific need for AFL to transfer your data to countries outside the European Economic Area, data will be transferred only to countries with adequate data security, and where there is a specific business reason for sharing that data.

Recipients of data:

- IpGeo (only receives IP address and then returns a location)
- Salesforce
- Marketo
- AtEvent
- GetFeedback
- Google Analytics
- Gatorleads
- Intercom
- Mailchimp

## EXTERNAL PRIVACY NOTICE

### **How does the organization protect data?**

The organisation takes the security of your data very seriously and has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused, disclosed, or accessed by anyone other than by its employees in the performance of their duties. Access to company systems is restricted to those who need the access to carry out their role.

Where the organization engages third parties to process personal data on its behalf, they do so: based on written instructions; are under a duty of confidentiality; and are obliged to implement appropriate technical and organizational measures to ensure data security.

### **How long does the organization keep data?**

We keep your information in line with our data retention policy. For example we'll normally keep your information for as long as is necessary for its intended purpose, unless there is a legal obligation or a legitimate interest to retain that data further. This enables us to comply with legal and regulatory requirements or use it where necessary for our legitimate purposes (for example, to help us respond to queries or complaints, detect and prevent crime, respond to requests from regulators, etc.). If we don't need to retain information for this period of time, we may destroy, delete or anonymize it more promptly.

### **Your rights**

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information on how we process it (free of charge);
- in some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;
- in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- the right to request that we rectify your information if it's inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;
- the right to object and request that we restrict, our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to restrict our processing of your information but we're entitled to continue processing your information and/or to refuse your request;
- You can exercise your rights by contacting us using the details set out at the bottom of this Privacy Notice. You also have a right to complain to the UK Information Commissioner's Office by visiting [www.ico.org.uk](http://www.ico.org.uk) or to the data protection regulator in the country where you live or work.

### **What we need from you**

You're responsible for making sure the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible. If you provide information for another person, you'll need to direct them to this notice.

## **EXTERNAL PRIVACY NOTICE**

### **How we keep your information secure**

We use a range of measures to keep your information safe and secure which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards including obligations to protect any information and to apply appropriate measures for the use and transfer of information.

### **Automated decision-making**

AFL does not use any form of automated decision making, such as profiling. We may undertake a simple credit check using a third party processor, however we would inform you of this prior to doing so.

### **Leaving our website**

We may, from time to time place external links on our website. If you click on a link to an external site, you will be subject to that organization's privacy policies and not ours.

### **Cookies**

If we use cookies, we will make a cookies policy available for your reference. The websites using cookies are:

- AFLglobal.com
- AFLHyperscale.com

**We may update our policies from time-to-time by posting a new version on our website. Please check regularly to be aware of any updates.**

**You may contact us using the details below:**

**AFL (Corporate Headquarters)**  
Legal/Compliance Department  
170 Ridgeview Center Drive  
Duncan, South Carolina 29334, USA  
+1 (800) 235-3423  
+1 (864) 433-0333  
Compliance\_Site@aflglobal.com

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