Global Data Privacy Policy

January 2015
As you are aware, Schneider Electric has leveraged digitization in the way we work with our customers, and in our collective work, capitalizing on the convergence of IT and energy technologies, the *internet of things* applied to energy.

It is now crucial for our Global digital Company to adopt an effective framework to regulate the use of personal information and to demonstrate our accountability in addressing the growing concerns about privacy and data protection.

This Global data privacy policy is our effort to achieve the correct balance between the specific challenges presented by rapidly evolving technology, the increasing value of personal information and the globalization of our data-reliant activities while ensuring compliance with the diverse privacy laws.

This policy is designed as a common framework to protect the personal information of all individuals and to leverage data as an enterprise asset and mitigate risk of data breach, data losses or misuses…

All entities are compelled to transpose this Global policy into their local data privacy policy and into their effective procedures and day to day practices.

Peter Wexler

SVP & General Counsel and Chief Compliance Officer

Finance- Legal
Introduction

Schneider Electric strongly supports the fundamental rights to privacy and data Protection as well as compliance with national and international privacy laws and regulations. In “Our Principles of Responsibility”, Schneider Electric commits to maintain confidential any personal information and to strictly limit any disclosure in accordance with local laws and regulations.

This global data privacy policy implements the Data Privacy Binding Corporate Rules (“BCR”), approved by the Data Protection Authorities of the European Union Members States in November 2012.

This global data privacy policy is applicable in Schneider Electric and its affiliates for the collection, processing, use, dissemination, transfer, and storage of personal information of our employees, candidates, customers, suppliers or any individual.

It imposes common rules for all entities of all countries (unless the national law provides more stringent provisions) and aim at ensuring a high level of protection of personal information within Schneider Electric.

Definition

Personal information (or personal data) means any information relating to an identified or identifiable natural person (‘data subject’).

Identifiable person means one individual who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

Data subjects refer to Individuals whose personal information is processed.

Processing means any operation or set of operations such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

Sensitive personal information means data containing personal information about racial or ethnic origin, political opinions, religious or political beliefs, trade-union membership, health or medical records, or criminal records.
Binding rules to process personal information

All Schneider Electric entities must observe and transpose into their day to day local practices the following principles when processing personal information:

Principles 1
Processing personal information fairly and lawfully.

Principles 2
Processing personal information for specified, legitimate purposes and not processing further in ways incompatible with those purposes.

Principles 3
Collecting personal information which is relevant to and not excessive for the purposes for which it is collected and used.

Principles 4
Keeping personal information only as long as it is necessary for the purposes for which it was collected and processed.

Principles 5
Maintaining personal information accurate, and where necessary, kept up-to-date.

Principles 6
Processing personal information in accordance with the individual’s legal right.

Principles 7
Taking appropriate technical, physical, and organizational measures to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to personal information.

Principles 8
When collecting sensitive personal data (such as data containing personal information about racial or ethnic origin, political opinions, religious or political beliefs, trade-union membership, health or medical records, or criminal records), Schneider Electric entities must ensure that the individual is informed and /or has provided consent to such collection and processing.

All Schneider Electric entities must ensure that these rules are effective.
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Legitimate business purposes

All entities must collect process and use personal data for legitimate business purposes only. Schneider Electric and its entities must process personal data for legitimate business, human resources and safety & security purposes. Such processing will be conducted within such purpose limitations and in accordance with applicable laws.

Fairness and Lawfulness

Schneider Electric entities must collect and uses personal information with appropriate notice and consent, along with required filings with data protection authorities, where applicable.

Sensitive personal information

- To the limited extent a Schneider Electric entity needs to collect any sensitive personal information, it must ensure that the individual is informed of such collection and processing and has provided his consent.
- Where required by law, the person’s explicit consent to the processing and particularly to the transfer of such data to non-Schneider Electric entities must be obtained.
- Appropriate security and protection measures (e.g., physical security devices, encryption and access restrictions) must be provided depending on the nature of these categories of sensitive data and the risks associated with the intended uses.
Automated decision

Except in very limited circumstances (e.g., the initial screening of some job seekers who express interest through online channels), Schneider Electric entities do not evaluate the data subjects solely on automated decisions. If automated decisions are made, affected persons are entitled to understand the logic and express their views on the Automated Decision in question.

Data sharing with Third Parties

When personal information is provided to Schneider Electric, either directly or through a reseller or other business partner, Schneider Electric will:

- Not sell or rent it to a third party without data subject permission unless (s)he opts–in.
- Use Customers contact information to provide them with information.

Schneider Electric believes they need to know or may find useful, such as (for example) news about our services and products and modifications to the company terms of service unless they opt-out.

Schneider Electric entities may be required to share personal information with selected third parties who perform certain business or employment related services on their behalf. Such data sharing is submitted:

- to a written agreement stipulating the third party commitments to protect personal information of the individuals concerned.
- to the respect of the European rules on trans-border data flows when the third party is located outside the European Union.
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Security measures

Schneider Electric and its subsidiaries are committed to taking appropriate technical, physical, and organizational measures to protect its employees and customers’ personal data against unauthorized access, unlawful processing, accidental loss or damage, and unauthorized destruction.

- Schneider Electric limits access to its internal systems that hold personal data to a selected group of authorized users who are given access to such systems through the use of a unique identifier and password. Access to Personal Data is limited to and provided to individuals for the purpose of performing their job duties.

- Schneider Electric entities must refer to the IT Security policies which detail the security requirements for an acceptable use, access, transmission of Schneider Electric information. They also must apply the Group sensitive information policy made available by Global Security Department.

Data Subjects Rights

The data subjects may inquire as to the nature of the personal data stored or processed about them by any Schneider Electric entity. They will be provided access to their own personal data regardless of the location of the data processing and storage.

A Schneider Electric entity processing such data cooperates in providing such access to them either directly or through a local entity.

If the personal data is inaccurate or incomplete, data subjects may request that their data be amended. All such requests for access or for information may be sent to:

Schneider Electric Country Data Privacy Correspondent

or

Schneider Electric Group Data Privacy Officer

Global-Data-Privacy@schneider-electric.com
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Notes:

Subject: Global data privacy policy
Issue Date: October 2014
Policy Owner: Legal Department – Danièle NGUYEN.
Supersedes: All Previous Policies
Review Date: Version Final (15 December 2014)

Purpose: Schneider Electric is a global company, with legal entities, business processes, management structures, and technical systems that cross national frontiers. This global data privacy policy applies to all Schneider Electric and its affiliates in all countries. It may be adapted or supplemented locally to take into account country’s specific legal requirements, as long as the adaptation is not less stringent than the principles established herein.

Scope: This global data privacy policy bounds all Schneider Electric entities and employees and all contractors processing personal data on behalf of Schneider Electric.

Disclaimer: Schneider Electric reserves the right to modify this Global data privacy policy as needed, for example, to comply with changes in laws, regulations, Schneider Electric practices and procedures, or requirements imposed by data protection authorities. In this case, Schneider Electric will inform Schneider Electric employees, candidates, customers, other persons and data protection authorities of any material changes in its global data privacy policy. Schneider Electric will post all changes on relevant internal and external communication channels.