

# GDPR Privacy Notice

Effective as of January 28, 2025

## General Data Protection Regulation Notice

Natural persons located in the European Economic Area (“EEA”), in the United Kingdom or in Switzerland, may have additional rights under the General Data Protection Regulation ((EU) 2016/679) (“EU GDPR”) and the EU GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and as amended by Schedule 1 to the Data Protection, Privacy and Electronic Communications (EU Exit) Regulations 2019 (SI 2019/419) (“UK GDPR”) or the Swiss Data Protection Act (“Swiss DPA”) and should review the GDPR Notice [here](#), which incorporates the requirements under such laws for providing data subjects with information about their personal data, including how we use it and their rights.

## Introduction

Bel Fuse Inc., and its subsidiaries and affiliates provide this GDPR Privacy Notice (this “**GDPR Notice**”), which is incorporated into our [Privacy Policy](#). To the extent of any conflict between this GDPR Privacy Notice and the Privacy Policy linked above, this GDPR Privacy Notice shall control with respect to use of personal data falling under the scope of the EU GDPR, UK GDPR and Swiss DPA. Any capitalized terms or other terms not defined herein (please refer to the ‘Glossary’ section at the bottom of this Notice) shall have the meaning ascribed to them in the Privacy Policy or, if not defined in the Privacy Policy, shall have the meaning ascribed to them in the EU GDPR.

This GDPR Notice informs you about how we process and protect your personal data when you visit our website (regardless of where you visit it from), communicate with us, purchase goods or services from us, or receive orders from us for goods or services, and tells you about your privacy rights and how the law protects you.

It is important that you read this GDPR Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This GDPR Notice supplements the other notices and is not intended to override them.

This GDPR Notice is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of this GDPR Notice here: [belfuse.com/bel-privacy-GDPR-Notice.pdf](https://belfuse.com/bel-privacy-GDPR-Notice.pdf). Please also use the Glossary to understand the meaning of some of the terms used in this GDPR Notice.

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## **1. Who We Are, How to Contact Us, and Other Key Information**

### **Controller**

Bel Fuse Inc. is made up of different legal entities, each of which may control your data from time to time. This GDPR Notice is issued on behalf of Bel Fuse Inc.’s subsidiaries and affiliates, so when we mention "**Bel Fuse**," "**we**," "**us**," or "**our**" in this GDPR Notice, we are referring to the relevant company responsible for processing your data unless stated otherwise.

The Bel Fuse Inc. group of companies is headquartered in the USA with operations around the world. For more information about the Bel Fuse Inc. group, including the identities and addresses of the different legal entities, please see [www.belfuse.com](http://www.belfuse.com).

We have appointed Data Protection Leads within our various affiliates who are responsible for overseeing questions in relation to this GDPR Notice. If you have any questions about this privacy notice, including any requests to exercise [your legal rights](#), please contact the appropriate Data Protection Lead (e.g., as applicable, the Data Protection Lead in your member state or the UK) using the details set out below:

<b>Ireland</b>	Bel Power Solutions Ireland Limited <a href="mailto:privacy.lim@psbel.com">privacy.lim@psbel.com</a> City Gate House Raheen business park Limerick Ireland	<b>Slovakia</b>	Bel Power Solutions s.r.o. <a href="mailto:privacy.dca@psbel.com">privacy.dca@psbel.com</a> Areal ZTS 924 018 41 Dubnica nad Vahom Slovakia
<b>Germany</b>	Bel Stewart GmbH <a href="mailto:privacy.dca@psbel.com">privacy.dca@psbel.com</a> Amelia-Mary-Earhart-Straße 8, 60549 Frankfurt am Main Germany	<b>United Kingdom</b>	Cinch Connectors Limited <a href="mailto:privacy.wrk@cinch.com">privacy.wrk@cinch.com</a> Shireoaks Road Workshop Nottinghamshire S80 3HA
<b>Italy</b>	Bel Power Europe SRL <a href="mailto:privacy.cmp@belpower.com">privacy.cmp@belpower.com</a> Via Resegone 28 Camparada (MB) IT20857 Italy		Cinch Connectivity Solutions Limited <a href="mailto:privacy.cfd@cinch.com">privacy.cfd@cinch.com</a> 11 Bilton Road Chelmsford Essex CM1 2UP
<b>Switzerland</b>	Bel Power Solutions GmbH <a href="mailto:privacy.uster@psbel.com">privacy.uster@psbel.com</a> Ackerstrasse 56 CH – 8610 Uster		

### Right to Lodge Complaint with a Supervisory Authority

You have the right to lodge a complaint at any time with the appropriate supervisory authority (also referred to as “data protection authorities”). Contact details for EU supervisory authorities can be found [here](#). The UK Information Confirmation can be contacted [here](#). The Swiss Federal Data Protection and Information Commissioner can be contacted [here](#).

We would, however, appreciate the chance to deal with your concerns before you lodge such complaint, so please contact us in the first instance.

### Third-Party Links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

### Children

Please note that our website, products, and services are not intended for children, and we do not knowingly collect data about children.

## Updates to this GDPR Notice

We may change this privacy policy from time to time - when we make significant changes we will take steps to inform you, by emailing you a copy of the updated privacy policy and displaying the new policy on our website.

## 2. The Data We Collect About You

Personal data under the EU GDPR, UK GDPR and Swiss DPA, means any information relating to an identified or identifiable individual. It does not include “anonymized” data, where certain data has been removed in such a way that the individual is no longer identifiable.

We may collect, use, store, and transfer different categories of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, and title.
- **Contact Data:** includes billing address, delivery address, email address, telephone numbers.
- **Financial Data:** includes bank account and payment card details.
- **Transaction Data:** includes details about quotes provided to you, payments to and from you, a purchase order number, an account number, shipping details and other details of products and services you have purchased from us.
- **Technical Data:** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website.
- **Profile Data:** includes purchases or orders made by you, your interests, preferences, feedback, and survey responses.
- **Usage Data:** includes information about how you use our website, products, and services.
- **Marketing and Communications Data:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data when it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this GDPR Notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data and under the Swiss DPA some additional similar categories) nor do we collect any information about criminal convictions and offences.

## If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

## 3. How Is Your Personal Data Collected

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your Identity, Contact, Financial, Transaction, and Marketing and Communication Data by filling in forms or by corresponding with us by post, phone, email, or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - subscribe to our service or publications;
  - contact us for technical or sales support;
  - request marketing to be sent to you;
  - enter a promotion or survey; or
  - give us feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data primarily by using cookies, pixel tags, and server logs. We use automatic data collection technology provided by certain analytics providers to evaluate your use of the Website, compile reports on activity (based on their collection of IP address, Internet service provider, browser type, operating system and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Website you visit, number of links you click while on the Website, search terms, and other data), and analyze performance metrics. Such providers may use tracking technologies, such as, but not limited to, cookies to help collect, analyze and provide us reports and/or data.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. Please refer to our Cookie Notice for more information on how we use cookies and other analytics information.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from analytics providers, such as Google based outside the European Economic Area (the “EEA”), the United Kingdom and Switzerland.

- Contact and Transaction Data from providers of technical, fulfilment, and delivery services based inside and outside the EEA, the United Kingdom and Switzerland.
- Identity, Contact, Financial, Profile, Usage, Transaction, and Marketing and Communication Data from third party agents or distributors based inside and outside the EEA, the United Kingdom and Switzerland.
- Identity and Contact Data from publicly available sources such as Companies House based inside the EEA, the United Kingdom and Switzerland.

#### 4. How and Why We Use Your Personal Data

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Click [here](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

#### Purposes for Which We Will Use Your Personal Data

We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. Where appropriate, we have also identified what our legitimate interests are.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> </ul>
To process and deliver your order including:	(a) Identity (b) Contact (c) Financial	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to recover debts due to us)</li> </ul>

<p>(a) Manage payments, fees, and charges</p> <p>(b) Collect and recover money owed to us</p>	<p>(d) Transaction</p>	
<p>To place orders with you including:</p> <p>(a) Manage payments, fees, and charges</p> <p>(b) Reconcile invoices</p> <p>(c) Obtain goods or services we have purchased</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Financial</p> <p>(d) Transaction</p>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for our legitimate interests (to ensure accurate payment and obtain goods or services we have paid for)</li> </ul>
<p>Notifying you about changes to our terms or privacy policy</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p>	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• To comply with our legal obligation to provide privacy disclosures</li> </ul>
<p>To enable you to complete a survey or enter a promotion</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>

<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>• Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</li> </ul>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences</p>	<p>(a) Technical (b) Usage</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business, and to inform our marketing strategy)</li> </ul>
<p>To make suggestions and recommendations and provide you with technical and sales information about goods or services that may</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to develop our products/services and grow our business)</li> </ul>



be of interest to you		
To carry out a credit check for you	(a) Identity (b) Contact (c) Financial	<ul style="list-style-type: none"> <li>• Necessary for our legitimate interests (to confirm you are able to pay for products or services)</li> <li>• Performance of a Contract with you</li> </ul>

### Marketing Communications and Opt-Out

We may use your Identity, Contact, Technical, Usage, and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have (i) consented to your personal data being used for marketing purposes (including requesting marketing communications from us); or (ii) previously purchased from us and in both cases you have not opted out of receiving that marketing at the point we first collected your personal data or at any point thereafter.

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can contact us using the details at the start of the privacy notice or use the email address [privacy@belf.com](mailto:privacy@belf.com) to tell us about your marketing preferences and to opt out of further marketing communications from us. Please note that this opt-out will not prohibit transactional or administrative emails being sent to you, such as those regarding a product/service purchase, warranty registration, product/service experience, or other transactions.

### 5. Disclosures of Your Personal Data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above:

- Internal Third Parties as defined in the [Glossary](#).
- External Third Parties as defined in the [Glossary](#).
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this GDPR Notice.

We require all third parties that process data under our control to respect the security of your personal data and to treat it in accordance with the law. All such third parties function as our agents, performing services at our instruction and on our behalf pursuant to contracts which require they provide at least the same level of privacy protection as is required by this Privacy Policy and implemented by us. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may also be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

## **6. Where your Personal Data is Held and International Transfers**

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see section 5: 'Disclosures of Your Personal Data'). We also share your personal data within the Bel Fuse Inc. group who are based in the United States of America. This will involve transferring your data outside the EEA, the United Kingdom and Switzerland.

Some of our external third parties are based outside the EEA, the United Kingdom and Switzerland so their processing of your personal data will also involve a transfer of data outside the EEA, the United Kingdom and Switzerland. Your data may be transferred to the United States of America and in any other country of the world. Other countries outside the EEA, the United Kingdom and Switzerland have differing data protection laws, some of which may provide lower levels of protection of privacy.

Whenever we transfer your personal data out of the EEA, the United Kingdom and Switzerland, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented or an exception is provided for:

- We will transfer your personal data to a recipient who is subject to, and has certified itself, under the EU-U.S. Data Privacy Framework or the U.S.-Swiss Data Privacy Framework with regard to such personal data transfer.
- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission or the UK Information Commissioner, or the Swiss Federal Council, as applicable in each case.
- We will ensure an adequate safeguard is in place, such as the Standard Contractual Clauses approved by the European Commission, and/or the UK Addendum and Addendum required under the Swiss DPA where applicable.
- A specific exception applies under relevant data protection law.
- An exception may apply, for example, in case of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented, or if data has been made available generally by you and you have not objected against the processing.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA, the United Kingdom and Switzerland.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the **'Updates to this GDPR Notice'** section.

#### **7. EU-U.S. Data Privacy Framework ("EU-U.S. DPF"), UK Extension to the EU-U.S. DPF and Swiss-U.S. Data Privacy Framework program ("Swiss-U.S. DPF")**

Bel Fuse Inc. also complies with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and Swiss-U.S. DPF, as set forth by the U.S. Department of Commerce. Bel Fuse Inc. has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (EU-U.S. DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom (and Gibraltar) in reliance on the UK Extension to the EU-U.S. DPF. Bel Fuse Inc. has certified to the U.S. Department of Commerce that it adheres to the Swiss-U.S. Data Privacy Framework Program Principles (Swiss-U.S. DPF Principles) with regard to the processing of personal data received from Switzerland in reliance on the Swiss-U.S. DPF. If there is any conflict between the terms in this privacy policy and the EU-U.S. DPF Principles and/or the Swiss-U.S. DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework (DPF) program, and to view our certification, please follow this [link](#).

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Bel Fuse Inc. commits to resolve DPF Principles-related complaints about our collection or use of your personal data. European Union, United Kingdom and Swiss individuals with inquiries or complaints regarding our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF should first contact us using the contact details under paragraph 1 above.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Bel Fuse Inc. commits to refer unresolved complaints concerning our handling of personal data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF to an independent dispute resolution mechanism, Data Privacy Framework Services, operated by BBB National Programs based in the United States. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related complaint to your satisfaction, please visit this [link](#) for more information or to file a complaint. This service is provided at no cost to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may invoke binding arbitration for some residual claims not resolved by other redress mechanisms. Please follow this [link](#) for further details. You also have the possibility, under certain conditions, to invoke binding arbitration for complaints regarding DPF compliance not resolved by any of the other DPF mechanisms. Please follow this [link](#) for additional information.

The U.S. entities and subsidiaries of our organisation that will adhere to the EU-U.S. DPF Principles and Swiss-U.S. Principles and are covered by our DPF certification are: (1) Bel Fuse Inc.; (2) Bel Power Solutions Inc.; (3) PAI Capital LLC; (4) Stratos International LLC; (5) Stratos Lightwave - Florida LLC; (6) Stratos Lightwave LLC; (7) Bel Transformer Inc.; (8) Transformer One; (9) Bel Power Inc.; (10) Cinch Connectivity Solutions Inc.; (11) Trompeter Electronics, Inc.; (12) Connector Ownership LLC; (13) Bel Connector Inc.; (14) Bel Ventures Inc. (15) Bel Worksop LLC; and (16) Mil Power Source Inc

Bel Fuse Inc. has responsibility for the processing of the personal data it receives under the DPF Principles and subsequently transfers to a third party acting as an agent on its behalf. Bel Fuse Inc. shall remain liable under the DPF Principles if its agent processes such personal data in a manner inconsistent with the DPF Principles, unless Bel Fuse Inc. is not responsible for the event giving rise to the damage.

If you have an inquiry regarding Bel Fuse Inc.'s privacy practices in relation to its EU-U.S. DPF, the UK Extension to the EU-U.S. DPF or Swiss DPF certification, we encourage you to contact us. The Federal Trade Commission (FTC) has jurisdiction over Bel Fuse Inc.'s compliance with the EU-U.S. DPF, the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF and Bel Fuse Inc. is subject to the investigatory and enforcement powers of the FTC.

## **8. Data Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **9. Data Retention**

### **How Long will You Use My Personal Data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Further information on specific retention periods for different types of personal data can be made available by contacting us using the contact details at section 1 above.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **10. Your Legal Rights**

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF, Bel Fuse Inc commits to cooperate and comply respectively with the advice of the panel established by the EU data protection authorities (DPAs) and the UK Information Commissioner's Office (ICO) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved complaints concerning our handling of human resources data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF and the Swiss-U.S. DPF in the context of the employment relationship.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)
- Right not to be subject to automated individual decision making.

If you wish to exercise any of the rights set out above, please contact us.

### **No Fee Usually Required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, under the EU GDPR and UK GDPR we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in

these circumstances. Under the Swiss DPA, similar rules apply, and we will let you know if we restrict, postpone or reject your request on such grounds.

### **What We May Need from You**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time Limit to Respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **11. Glossary**

### **LAWFUL BASIS**

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

**Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

### **THIRD PARTIES**

#### **Internal Third Parties**

Other companies in the Bel Fuse, Inc. group, who are based in the USA and provide management, IT, and system administration services and undertake leadership reporting. We may also share your personal data if required to provide our services with other entities within the global Bel Fuse group.

#### **External Third Parties**

- Service providers based inside and outside the EEA, the United Kingdom and Switzerland who provide IT and system administration services, direct marketing, web analytics, order

fulfilment, data storage, hosting services, sales support, credit card processors, Enterprise Resource Planning software vendors and logistics support companies.

- Suppliers of goods and services based inside and outside the EEA, the United Kingdom and Switzerland who provide component goods and services which form part of the goods and services we provide as part of any contract with you.
- Storage and fulfilment providers based inside and outside the EEA, the United Kingdom and Switzerland who provide storage and delivery services.

We or the third parties mentioned above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; and
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymized but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations

If you would like more information about who we share our data with and why, please contact us.

## **YOUR LEGAL RIGHTS**

You have the right to:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data or corrections you provide to us.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no lawful reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Data portability** – the right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.
- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Not to be subject to automated individual decision making** where you do not want to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.
- Under the Swiss DPA you have similar rights, subject to certain restrictions defined by law that we are entitled or even required to apply (e.g., to protect third party interests).