

## CELESTICA PRIVACY NOTICE

### (A) This Notice

#### Summary – This Notice

This Notice explains how we may Process your Personal Data. This Notice may be amended or updated from time to time, so please check it regularly for updates.

This Notice is issued by Celestica Inc. on behalf of itself, its subsidiaries and its affiliates (together, “**Celestica**”, “**we**”, “**us**” and “**our**”) and is addressed to individuals outside our organisation with whom we interact, including customers, vendors, visitors to our Sites, visitors to our premises and other users of our products or services (together, “**you**”). Defined terms used in this Notice are explained in Section (S) below.

For the purposes of this Notice, Celestica is the Controller. Contact details are provided in Section (R) below.

This Notice may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable law. We encourage you to read this Notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Notice.

### (B) Collection of Personal Data

#### Summary – Collection of Personal Data

We may collect or obtain Personal Data about you: directly from you (e.g., where you contact us); in the course of our relationship with you (e.g., if you make a purchase); when you make your Personal Data public (e.g., if you make a public post about us on social media); when you visit our Sites; when you register to use any of our Sites, products, or services; or when you interact with any third party content or advertising on a Site. We may also receive Personal Data about you from third parties (e.g., law enforcement authorities).

**Collection of Personal Data:** We may collect Personal Data about you from the following sources:

- **Data you provide:** We may obtain your Personal Data when you provide it to us (e.g., where you contact us *via* email or telephone, or by any other means, or when you provide us with your business card or when you visit our premises and provide your Personal Data).
- **Relationship data:** We may collect or obtain your Personal Data in the ordinary course of our relationship with you (e.g., if you or the company where you work purchase a product or service from us).
- **Data you make public:** We may collect or obtain your Personal Data that you manifestly choose to make public, including *via* social media (e.g., we may collect information from your social media profile(s), if you make a public post about us).
- **Site data:** We may collect or obtain your Personal Data when you visit any of our Sites or use any features or resources available on or through a Site.
- **Registration details:** We may collect or obtain your Personal Data when you use, or register to use, any of our Sites, products, or services.
- **Content and advertising information:** If you choose to interact with any third party content or advertising on a Site, we may receive Personal Data about you from the relevant third party.
- **Third party information:** We may collect or obtain your Personal Data from third parties who provide it to us (e.g., credit reference agencies; law enforcement authorities; etc.).

### (C) Creation of Personal Data

#### Summary – Creation of Personal Data

We may create Personal Data about you (e.g., records of your interactions with us).

We may also create Personal Data about you, such as records of your interactions with us, and details of your or your company's purchase history.

#### (D) Categories of Personal Data we may Process

##### Summary – Categories of Personal Data we may Process

We may Process: your personal details (e.g., your name); demographic data (e.g., your age); your contact details (e.g., your address); records of your consents; purchase details; payment details (e.g., your billing address); information about our Sites (e.g., the type of device you are using); details of your employer (where relevant); information about your interactions with our content or advertising; and any views or opinions you provide to us.

We may Process the following categories of Personal Data about you:

- Personal details: given name(s); preferred name; and photograph.
- Demographic information: gender; date of birth / age; nationality; salutation; title; and language preferences.
- Contact details: correspondence address; shipping address; telephone number; email address; and details of your public social media profile(s).
- Consent records: records of any consents you may have given, together with the date and time, means of consent and any related information (e.g., the subject matter of the consent).
- Purchase details: records of purchases and prices; consignee name, address, contact telephone number and email address.
- Payment details: invoice records; payment records; billing address; payment method; bank account number or credit card number; cardholder or accountholder name; card or account security details; card 'valid from' date; card expiry date; BACS details; SWIFT details; IBAN details; payment amount; payment date; and records of cheques.
- Data relating to our Sites: device type; operating system; browser type; browser settings; IP address; language settings; dates and times of connecting to a Site; username; password; security login details; usage data; aggregate statistical information.
- Employer details: where you interact with us in your capacity as an employee, the name, address, telephone number and email address of your employer, to the extent relevant.
- Content and advertising data: records of your interactions with our online advertising and content, records of advertising and content displayed on pages displayed to you, and any interaction you may have had with such content or advertising (including mouse hover, mouse clicks, any forms you complete (including incomplete forms not submitted) and any touchscreen interactions.
- Views and opinions: any views and opinions that you choose to send to us, or publicly post about us on social media platforms.

#### (E) Lawful basis for Processing Personal Data

##### Summary – Lawful basis for Processing Personal Data

We may Process your Personal Data where: you have given your prior, express consent; the Processing is necessary for a contract between you and us; the Processing is required by applicable law; the Processing is necessary to protect the vital interests of any individual; or where we have a valid legitimate interest in the Processing

In Processing your Personal Data in connection with the purposes set out in this Notice, we may rely on one or more of the following legal bases, depending on the circumstances:

- Consent: We may Process your Personal Data where we have obtained your prior, express consent to the Processing where required (note that this consent is not necessary for Processing that is necessary or obligatory in any way);
- Contractual necessity: We may Process your Personal Data where the Processing is necessary in connection with any contract that you may or the company that you work for enter into with us;

- Compliance with applicable law: We may Process your Personal Data where the Processing is required by applicable law;
- Vital interests: We may Process your Personal Data where the Processing is necessary to protect the vital interests of any individual; or
- Legitimate interests: We may Process your Personal Data where we have a legitimate interest in the Processing, and that legitimate interest is not overridden by your interests, fundamental rights, or freedoms. The balancing test we have conducted in each case is as follows:
  - we have ensured that the Processing is lawful, proportionate, and conducted in accordance with the terms of this Notice;
  - we have ensured that we have a legitimate business need to perform the Processing; and
  - we have ensured that there is no material likelihood of any adverse impact on your interests, fundamental rights, or freedoms, as a result of the Processing.

## (F) Sensitive Personal Data

### Summary – Sensitive Personal Data

We do not seek to collect or otherwise Process your Sensitive Personal Data (other than information provided by you on the food that you should not eat). Where we need to Process your Sensitive Personal Data for a legitimate purpose, we do so in accordance with applicable law.

We do not seek to collect or otherwise Process your Sensitive Personal Data in the ordinary course of our business (other than information provided by you on the food that you should not eat). Where it becomes necessary to Process your Sensitive Personal Data for any reason, we rely on one of the following legal bases:

- Compliance with applicable law: We may Process your Sensitive Personal Data where the Processing is required or permitted by applicable law (e.g., to comply with our diversity reporting obligations);
- Detection and prevention of crime: We may Process your Sensitive Personal Data where the Processing is necessary for the detection or prevention of crime (including the prevention of fraud);
- Establishment, exercise or defence of legal rights: We may Process your Sensitive Personal Data where the Processing is necessary for the establishment, exercise or defence of legal rights; or
- Consent: We may Process your Sensitive Personal Data where we have, in accordance with applicable law, obtained your prior, express consent prior to Processing your Sensitive Personal Data (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

## (G) Purposes for which we may Process your Personal Data

### Summary – Purposes for which we may Process your Personal Data

We may Process your Personal Data for the following purposes: providing products and services to you; operating our Sites; communicating with you; managing our IT systems; health and safety; financial management; conducting surveys; ensuring the security of our premises and systems; conducting investigations where necessary; compliance with applicable law; and improving our Sites, products and services.

We may Process your Personal Data for the following purposes, subject to applicable law:

- Provision of products and services to you: providing our Sites, products, or services to you; providing you with products and services that you have requested; providing you with promotional items at your request; and communicating with you in relation to those products and services.

- Our Sites: operating and managing our Sites; providing content to you; displaying advertising and other information to you; communicating and interacting with you *via* our Sites; and notifying you of changes to any of our Sites, our products, or our services.
- Communications: communicating with you *via* any means (including *via* email, telephone, text message, social media, post or in person) news items and other information in which you may be interested, subject to ensuring that such communications are provided to you in compliance with applicable law; maintaining and updating your contact information where appropriate; and obtaining your prior, opt-in consent where required.
- Communications and IT operations: management of our communications systems; operation of IT security systems; and IT security audits.
- Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations.
- Financial management: sales; finance; corporate audit; and vendor management.
- Surveys: engaging with you for the purposes of obtaining your views on our products and services or also to conduct surveys on specific topics required in the contractual relationship between our companies.
- Security: physical security of our premises (including records of visits to our premises; and CCTV recordings); and electronic security (including login records and access details).
- Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law.
- Legal proceedings: establishing, exercising and defending legal rights.
- Legal compliance: compliance with our legal and regulatory obligations under applicable law.
- Improving our Sites, products and services: identifying issues with our Sites, our products, or our services; planning improvements to our Sites, our products, or our services; and creating new Sites, products, or services.

#### (H) Disclosure of Personal Data to third parties

##### Summary – Disclosure of Personal Data to third parties

We may disclose your Personal Data to: legal and regulatory authorities; our external advisors; our Processors; any party as necessary in connection with legal proceedings; any party as necessary for investigating, detecting or preventing criminal offences; any purchaser of our business; and any third party providers of advertising, plugins or content used on our Sites.

We may disclose your Personal Data to other entities within the Celestica group, for legitimate business purposes (including operating our Sites, and providing products and services to you), in accordance with applicable law. In addition, we may disclose your Personal Data to:

- you and, where appropriate, your appointed representatives or to companies within your group of companies;
- legal and regulatory authorities, upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, lawyers and other outside professional advisors to Celestica, subject to binding contractual obligations of confidentiality;
- third party Processors (such as payment services providers; shipping companies; etc.), located anywhere in the world, subject to the requirements noted below in this Section (H);
- any relevant party, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security;
- any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); and
- any relevant third party provider, where our Sites use third party advertising, plugins or content. If you choose to interact with any such advertising, plugins or content, your Personal Data may

be shared with the relevant third party provider. We recommend that you review that third party's privacy policy before interacting with its advertising, plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

#### **(I) International transfer of Personal Data**

##### **Summary – International transfer of Personal Data**

We may transfer your Personal Data to recipients in other countries. Where we transfer Personal Data from the EEA to a recipient outside the EEA that is not in an Adequate Jurisdiction, we do so on the basis of Standard Contractual Clauses.

Because of the international nature of our business, we may need to transfer your Personal Data within the Celestica group, and to third parties as noted in Section (H) above, in connection with the purposes set out in this Notice. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements to those that apply in the country in which you are located.

Where we transfer your Personal Data from the EEA to recipients located outside the EEA who are not in Adequate Jurisdictions, we do so on the basis of Standard Contractual Clauses. You may request a copy of our Standard Contractual Clauses using the contact details provided in Section (R) below.

Please note that when you transfer any Personal Data directly to a Celestica entity established outside the EEA, we are not responsible for that transfer of your Personal Data. We will nevertheless Process your Personal Data, from the point at which we receive those data, in accordance with the provisions of this Notice.

#### **(J) Data security**

##### **Summary – Data security**

We implement appropriate technical and organisational security measures that protect your Personal Data. Please ensure that any Personal Data that you send to us are sent securely.

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

Because the internet is an open system, the transmission of information *via* the internet is not completely secure. Although we will implement all reasonable measures to protect your Personal Data, we cannot guarantee the security of your data transmitted to us using the internet – any such transmission is at your own risk and you are responsible for ensuring that any Personal Data that you send to us are sent securely.

#### **(K) Data accuracy**

##### **Summary – Data accuracy**

We take every reasonable step to ensure that your Personal Data are kept accurate and up-to-date and are erased or rectified if we become aware of inaccuracies.

We take every reasonable step to ensure that:

- your Personal Data that we Process are accurate and, where necessary, kept up to date; and
- any of your Personal Data that we Process that are inaccurate (having regard to the purposes for which they are Processed) are erased or rectified without delay.

From time to time we may ask you to confirm the accuracy of your Personal Data.

**(L) Data minimisation**

**Summary – Data minimisation**

We take every reasonable step to limit the volume of your Personal Data that we Process to what is necessary.

We take every reasonable step to ensure that your Personal Data that we Process are limited to the Personal Data reasonably necessary in connection with the purposes set out in this Notice.

**(M) Data retention**

**Summary – Data retention**

We take every reasonable step to ensure that your Personal Data are only retained for as long as they are needed in connection with a lawful purpose.

We take every reasonable step to ensure that your Personal Data are only Processed for the minimum period necessary for the purposes set out in this Notice. The criteria for determining the duration for which we will retain your Personal Data are as follows:

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(1) we will retain copies of your Personal Data in a form that permits identification only for as long as:

(a) we maintain an ongoing relationship with you (e.g., where you are lawfully included in our mailing list and have not unsubscribed); or

(b) your Personal Data are necessary in connection with the lawful purposes set out in this Notice, for which we have a valid and continuing legal basis (e.g., where your personal data are included in a contract between us and your employer),

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**plus:**

(2) the duration of:

(a) any applicable limitation period under applicable law (i.e., any period during which any person could bring a legal claim against us in connection with your Personal Data, or to which your Personal Data may be relevant);

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**and:**

(3) in addition, if any relevant legal claims are brought, we may continue to Process your Personal Data for such additional periods as are necessary in connection with that claim.

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During the periods noted in paragraphs (a) and **Error! Reference source not found.** above, we will restrict our Processing of your Personal Data to storage of, and maintaining the security of, those Personal Data, except to the extent that those Personal Data need to be reviewed in connection with any legal claim, or any obligation under applicable law.

Once the periods in paragraphs (1), (2) and (3) above, each to the extent applicable, have concluded, we will permanently delete or destroy the Personal Data

## (N) Your legal rights

### Summary – Your legal rights

Under applicable law, you may have a number of rights, including: the right not to provide your Personal Data to us; the right of access to your Personal Data; the right to request rectification of inaccuracies; the right to request the erasure, or restriction of Processing, of your Personal Data; the right to object to the Processing of your Personal Data; the right to have your Personal Data transferred to another Controller; the right to withdraw consent; and the right to lodge complaints with Data Protection Authorities. We may require proof of your identity before we can give effect to these rights.

Subject to applicable law, you may have the following rights regarding the Processing of your Relevant Personal Data, including:

- the right not to provide your Personal Data to us (however, please note that we may be unable to provide you with the full benefit of our Sites, our products, or our services, if you do not provide us with your Personal Data – e.g., we may not be able to process your orders without the necessary details);
- the right to request access to, or copies of, your Relevant Personal Data, together with information regarding the nature, Processing and disclosure of those Relevant Personal Data;
- the right to request rectification of any inaccuracies in your Relevant Personal Data;
- the right to request, on legitimate grounds:
  - erasure of your Relevant Personal Data; or
  - restriction of Processing of your Relevant Personal Data;
- the right to have certain Relevant Personal Data transferred to another Controller, in a structured, commonly used and machine-readable format, to the extent applicable;
- where we Process your Relevant Personal Data on the basis of your consent, the right to withdraw that consent; and
- the right to lodge complaints regarding the Processing of your Relevant Personal Data with a Data Protection Authority (in particular, the Data Protection Authority of the EU Member State in which you live, or in which you work, or in which the alleged infringement occurred, each if applicable).

**Subject to applicable law, you may also have the following additional rights regarding the Processing of your Relevant Personal Data:**

- **the right to object, on grounds relating to your particular situation, to the Processing of your Relevant Personal Data by us or on our behalf; and**
- **the right to object to the Processing of your Relevant Personal Data by us or on our behalf for direct marketing purposes.**

This does not affect your statutory rights.

To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Notice, or about our Processing of your Personal Data, please use the contact details provided in Section (R) below. Please note that:

- we may require proof of your identity before we can give effect to these rights; and
- where your request requires the establishment of additional facts (e.g., a determination of whether any Processing is non-compliant with applicable law) we will investigate your request reasonably promptly, before deciding what action to take.

## (O) Cookies and similar technologies

### Summary – Cookies and similar technologies

We may Process your Personal Data by placing or reading Cookies and similar technologies. For more information, please see our [Terms of Use](#)

When you visit a Site we may place Cookies onto your device, or read Cookies already on your device, subject always to obtaining your consent, where required, in accordance with applicable law. We use Cookies to record information about your device, your browser and, in some cases, your preferences and browsing habits. We may Process your Personal Data through Cookies and similar technologies, in accordance with our Cookie Policy.

## (P) Terms of Use

### Summary – Terms of Use

Our [Terms of Use](#) govern all use of our Sites.

All use of our Sites, our products, or our services is subject to our [Terms of Use](#). We recommend that you review our Terms of Use regularly, in order to review any changes we might make from time to time.

## (Q) Direct marketing

### Summary – Direct marketing

We may Process your Personal Data to contact you with information regarding products or services that may be of interest to you. You may unsubscribe for free at any time.

We may Process your Personal Data to contact you *via* email, telephone, direct mail or other communication formats to provide you with information regarding products or services that may be of interest to you. If we provide products or services to you, we may send information to you regarding our products or services, upcoming promotions and other information that may be of interest to you, using the contact details that you have provided to us and always in compliance with applicable law.

You may unsubscribe from our promotional email list at any time by simply clicking on the unsubscribe link included in every promotional email we send. After you unsubscribe, we will not send you further promotional emails, but we may continue to contact you to the extent necessary for the purposes of any products or services you have requested.

## (R) Contact details

### Summary – Contact details

You may contact us at via post, telephone or email.

If you have any comments, questions or concerns about any of the information in this Notice, or any other issues relating to the Processing of Personal Data carried out by us, or on our behalf, please contact:

Compliance Department  
Celestica Inc.  
5140 Yonge Street, 19<sup>th</sup> floor  
Toronto, Ontario, Canada M2N 6L7

418 448 5800

[privacy@celestica.com](mailto:privacy@celestica.com)

## (S) Definitions

- **“Adequate Jurisdiction”** means a jurisdiction that has been formally designated by the European Commission as providing an adequate level of protection for Personal Data.



- **“Cookie”** means a small file that is placed on your device when you visit a website (including our Sites). In this Notice, a reference to a “Cookie” includes analogous technologies such as web beacons and clear GIFs.
- **“Controller”** means the entity that decides how and why Personal Data are Processed.
- **“Data Protection Authority”** means an independent public authority that is legally tasked with overseeing compliance with applicable data protection laws.
- **“EEA”** means the European Economic Area.
- **“Personal Data”** means information that is about any individual, or from which any individual is directly or indirectly identifiable, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.
- **“Process”, “Processing” or “Processed”** means anything that is done with any Personal Data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Processor”** means any person or entity that Processes Personal Data on behalf of the Controller (other than employees of the Controller).
- **“Relevant Personal Data”** means Personal Data in respect of which we are the Controller.
- **“Sensitive Personal Data”** means Personal Data about race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, any actual or alleged criminal offences or penalties, national identification number, or any other information that may be deemed to be sensitive under applicable law.
- **“Standard Contractual Clauses”** means template transfer clauses adopted by the European Commission or adopted by a Data Protection Authority and approved by the European Commission.
- **“Site”** means any website operated, or maintained, by us or on our behalf.

Version Date: May 7, 2019