

GDPR Privacy Notice

Effective as of 11 December 2018

Introduction

Welcome to the Bel Fuse Inc. 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 GDPR. Any capitalized terms or other terms not defined herein shall have the meaning ascribed to them in the Privacy Policy or, if not defined herein or elsewhere in the Privacy Policy, the 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: https://belfuse.com/resources/terms/Bel-GDPR-Notice.pdf?language_id=1. 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 and How to Contact Us

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 wholly-owned 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, please see 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) using the details set out below:

Contact details: Czech Republic

Our full details for the Czech Republic are:

Full name of legal entity: BEL STEWART S.R.O.

Name of Data Protection Lead: Marcel Filipek

Email address: privacy.dca@psbel.com

Postal address: NA BOJISTI 2, PRAGUE 2, 120 00, CZECH REPUBLIC

Contact details: Germany

Our full details for Germany are:

Full name of legal entity: Bel Stewart GmbH

Name of Data Protection Lead: Claudia Prebeck

Email address: gdpr.friedrichsdorf@belf.com

Postal address: Industriestraße 20, 61381 Friedrichsdorf, Germany

Contact details: Italy

Our full details for Italy are:

Full name of legal entity: BEL POWER EUROPE SRL

Name of Data Protection Lead: Marcel Filipek

Email address: privacy.dca@psbel.com

Postal address: VIA RESEGONE, 28 CAMPARADA (MB) IT-20857, ITALY.

Contact details: Ireland

Our full details for Ireland are:

Full name of legal entity: Bel Power Solutions Ireland Limited

Name of Data Protection Lead: Cristina Birdthistle

Email address: privacy.lim@psbel.com

Postal address: City Gate House, Raheen business park, Limerick, Ireland

Contact details: Slovakia

Our full details for Slovakia are:

Full name of legal entity: Bel Power Solutions s.r.o.

Name of Data Protection Lead: Marcel Filipek

Email address: privacy.dca@psbel.com

Postal address: Areal ZTS 924, 018 41 Dubnica nad Vahom, Slovakia

Contact details: United Kingdom

Our full details for the United Kingdom are:

Full name of legal entity: Cinch Connectors Limited

Name of Data Protection Lead: Helen Pearson

Email address: privacy.wrk@cinch.com

Postal address: Shireoaks Road, Worksop, Nottinghamshire, S80 3HA

Full name of legal entity: Cinch Connectivity Solutions Limited

Name of Data Protection Lead: Donna Morris

Email address: privacy.cfd@cinch.com

Postal address: 11 Bilton Road, Chelmsford, Essex, CM1 2UP

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 at: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

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

If, in the future, we intend to process your personal data for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information at a reasonable time prior to such processing. After such time, the relevant information relating to such processing activity will be revised or added appropriately within this GDPR Notice, and the “Effective Date” at the top of this page will be updated accordingly.

2. The data we collect about you

Personal data under the GDPR, 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 and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you 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) 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 some 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.

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.

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

4. **How 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, in a table format, 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	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To place orders with you including: (a) Manage payments, fees, and charges (b) Reconcile invoices (c) Obtain goods or services we have purchased	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) and (c) Performance of a contract with you (b) Necessary for our legitimate interests (to ensure accurate payment and obtain goods or services we have paid for)
Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you and as necessary to comply with our legal obligation to provide privacy disclosures
To enable you to complete a survey or enter a promotion	(a) Identity (b) Contact (c) Profile	(a) Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our

	(d) Usage (e) Marketing and Communications	marketing strategy)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) 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 reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships, and experiences	(a) Technical (b) Usage	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)
To make suggestions and recommendations and provide you with technical and sales information about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)
To carry out a credit check for you	(a) Identity	(a) Necessary for our legitimate interests (to confirm you are able to

	(b) Contact (c) Financial	pay for products or services) (b) Performance of a Contract with you
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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 requested information from us or purchased goods or services from us or if you provided us with your details when you registered for a promotion and, in each case, you have not opted out of receiving that marketing.

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 to tell us about your marketing preferences and to opt out of further marketing communications from us. Please note that this opt-out will transactional or administrative emails, 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 set out in the [Glossary](#).
- External Third Parties as set out 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 to respect the security of your personal data and to treat it in accordance with the law. 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.

6. International transfers

We share your personal data within the Bel Fuse Inc. group.. This will involve transferring your data outside the EEA.

Some of our external third parties are based outside the EEA so their processing of your personal data will also involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- 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 pursuant to Article 45(1).
- Where we use certain service providers, we may use [the](#) Standard Contractual Clauses approved by the European Commission, which provide adequate safeguards for the transfer of personal data pursuant to Article 45(9).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield (Article 45(3)) which is a data transfer mechanism developed between the European Commission and Department of Commerce for the transfer of data from the EEA and Switzerland. Please see Bel Fuse Inc.'s Privacy Shield Notice [here](#).

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

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised 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.

8. 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 unauthorised 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.

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 anonymise 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.

9. Your legal rights

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.](#)

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, 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.

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.

10. 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.

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.

External Third Parties

- Service providers based inside and outside the EEA who provide IT and system administration services.
- Suppliers of goods and services based inside and outside the EEA 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 who provide storage and delivery services.
- Professional advisers including lawyers, bankers, auditors, and insurers based inside and outside the EEA who provide consultancy, banking, legal, insurance and accounting services.
- Revenue & Customs, regulators, and other authorities based inside and outside the EEA.

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 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 good 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.
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **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.