| Policy Name: | Harman Privacy Principles & Governance Policy | | |
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# 1 Table of Contents


1 Table of Contents ..... 1
2 Purpose ..... 3
3 Scope ..... 3
4 Terms & Definitions ..... 3
5 HARMAN Privacy Program Principles ..... 5
5.1 Notice, Choice, and Consent ..... 5
5.2 Personal Data Minimization ..... 5
5.3 Purpose Limitation and Access Minimization ..... 6
5.4 Personal Data Processing Inventory ..... 6
5.5 Data Subject Rights ..... 6
5.6 Security and Personal Data Breach ..... 6
5.7 Privacy Risks Assessments of New Systems ..... 6
5.8 Third-Party Risk Management ..... 6
5.9 International Personal Data Transfers ..... 7
5.10 Training ..... 7
6 HARMAN Privacy Governance ..... 7

7 Violations and Enforcement ..... 8
8 Limitation on Scope of the Policy and Privacy Principles ..... 8
9 Related Documents ..... 8
10 Approval and Ownership ..... 9
11 Revision History ..... 9

# 2 Purpose

This HARMAN Privacy Principles & Governance Policy (Policy) establishes HARMAN's Personal Data protection standards, the minimum requirements for implementing HARMAN's privacy program, the principles on which the program is based and the program's governance structure. The Policy helps ensure HARMAN's protection and legally compliant Processing of Personal Data that HARMAN collects and receives. The Policy is in furtherance of HARMAN's commitment to protect individual privacy rights and ensure compliance with Data Protection Laws in the countries where HARMAN does business, as stated in HARMAN's Privacy Policy. Additional obligations and responsibilities are set forth in related policies identified in Section 9 and applicable information and data security policies that HARMAN DigITal maintains.

In the event of a conflict between this Policy and applicable law, HARMAN will comply with applicable law. In the event of a conflict between this Policy and any other HARMAN policy or procedure, HARMAN will comply with this Policy.

# 3 Scope

This Policy applies to all HARMAN Workers that access Personal Data.

This Policy applies to all Personal Data regardless of the format or medium of consumption (e.g., electronic, digital, paper files, verbal communications) that HARMAN receives from or provides to: (i) Workers, acting within the scope of their employment or engagement with HARMAN; (ii) Third Parties, in the course of HARMAN's development and distribution of our products; (iii) Customers who use HARMAN's products and services; (iv) prospective Customers with an interest in HARMAN's products and services; and (v) Suppliers HARMAN engages to support HARMAN's business activities.

This Policy applies to all categories of Personal Data. The scope of Personal Data is broad. Whether Data Protection Laws treat data as personal depends on the context in which it is Processed. Any data can become Personal Data if it, alone or in combination with other data, can identify an individual, a specific device, or a household.

This Policy applies to all Processing of Personal Data, including individual Processing of Personal Data by Workers in connection with performing professional responsibilities or contractual obligations.

HARMAN will regularly review and update this Policy, and the accompanying documentation to reflect changes in HARMAN's operations and requirements in applicable Data Protection Laws.

This Policy incorporates general data protection principles and standards. It does not reflect all legal requirements that may apply to HARMAN in each country where we operate. HARMAN Workers should contact privacy@harman.com with any questions regarding specific local requirements.

This policy does not cover policies and practices of the HARMAN information security program which HARMAN DigITal maintains.

# 4 Terms & Definitions

**"Customer"** means any organization or individual for which HARMAN provides a product or service.

**"Data Protection Law"** means any local, national, and regional data protection or privacy law that applies to any HARMAN business activities.

**"Data Subject"** means the natural person to whom the Personal Data pertains.

"**Data Subject Request**" means a request by a Data Subject to exercise rights related to their Personal Data including to receive information about their Personal Data, obtain access to, modification of, or erasure of their Personal Data, and limit, opt out of, or otherwise object to the Processing of their Personal Data. Such rights are provided for in many Data Protection Laws but differ in extent and application.

**"HARMAN Personnel"** means HARMAN employees, officers, and directors.

**"HARMAN Contractors"** means Agency temporaries and independent contractors, as set forth in HARMAN's Temporary and Contract Policy.

**"HARMAN Workers"** means HARMAN Personnel, HARMAN Contractors, and others who access Personal Data in the course of executing their professional duties or contractual obligations on behalf of HARMAN.

**"Personal Data**" means any information in any media or format relating to an identified or identifiable natural person. Personal Data is also referred to as personal information in Data Protection Laws and includes personally identifiable information (or PII) and Sensitive Personal Data. Personal Data also includes People Data as defined by HARMAN internal policies and procedures. Personal Data does not include information that is anonymized, aggregated, or de-identified as those terms are defined in Data Protection Laws. Common categories of Personal Data include:

*Contact Information:* Addresses, phone numbers, email addresses, and social media account identifiers;

*Commercial Information:* Records of personal properties, purchasing history, spending habits, or other purchasing or consuming histories or tendencies;

*Worker information:* Contact information, personnel number, employer information, job title, reporting manager and direct reports, business unit/division, employment contract, work history, term/duration of work (hiring and termination), performance evaluations, exit interviews, promotions, disciplinary actions, leave of absence benefits, other employment records, background checks, work-related communications such as emails and chat logs, salary/wages, expense details, benefits and insurance information, work performance monitoring data such as computer usage logs, internet browsing history, time tracking data;

*Family Information:* Children's name, spouse's or partner's names, parent's/guardian's names, emergency contact information, custody information;

*Job Application Information:* Resume, cover letter, references, application form, qualifications / certifications, professional memberships, other data contained within an applicant tracking system, pre-employment personality tests;

*Name:* First, last, and middle name, maiden name, nickname, signature;

*Online Activities:* Cookie identifiers, mobile advertising identifiers, device identifiers, usernames, passwords, IP addresses, online account information, browsing history, social media account information and activity;

*Personal Characteristics:* Date of birth, place of birth, age, gender, weight, height, social status, nationality, languages, marital status, military or veteran status, character, general reputation; and

*Sensory Data:* Audio, electronic, visual, thermal, olfactory, similar information.

"**Personal Data Breach**" means any unauthorized access to, acquisition or disclosure of Personal Data, the loss of availability of Personal Data, or the compromised integrity of Personal Data.

"**Process**" or "**Processing**" of Personal Data means any action performed on or with Personal Data including collection, recording, use, disclosure, organization, structuring, storage, adaptation or alteration, retrieval, consultation, disclosure, combination, restriction, erasure, and destruction.

"**Sensitive Personal Data**" means a subset of Personal Data that Data Protection Laws afford special protection because access or disclosure without authorization or misuse could significantly risk a Data Subject's privacy, security, reputation, or financial well-being. Common categories of Sensitive Personal Data include:

Biometric data (e.g., fingerprints, facial recognition data, retinal scans, or voiceprints, *etc.*);

Criminal records;

Email, mail, and text message content when the business is not the intended recipient of the communication;

Financial information (e.g., bank account numbers, credit/debit card numbers, credit scores);

Genetic information (e.g., DNA sequences or genetic test results);

Government-issued identification numbers (e.g., social security numbers, driver's license numbers, passport numbers, or alien registration number);

Health and medical information,

Political opinions/affiliation;

Precise geolocation data (e.g., latitude/longitude, or other information that can identify the precise location of an individual);

Race or ethnic origin;

Religious, philosophical, or moral beliefs;

Trade union membership; and

Sexual life and sexual orientation.

**"Supplier"** means any Third Party that provides products or services to HARMAN.

"**Third Party**" means any person or organization other than HARMAN, an affiliate of HARMAN, or Worker.

# 5 HARMAN Privacy Program Principles

## 5.1 Notice, Choice, and Consent

HARMAN collects or receives Personal Data from or about Data Subjects. We will provide notice when necessary to the Data Subject that describes the Personal Data collected, the purposes for collection, and to whom the Personal Data may be disclosed. The notice will also explain how Data Subjects can exercise their rights related to their Personal Data. Such notices take different forms depending on the context in which the Personal Data is received.

Certain Data Protection Laws provide Data Subjects with choices regarding how HARMAN Processes their Personal Data. HARMAN will provide Data Subjects with appropriate options to allow Data Subjects to communicate their choices. HARMAN will implement appropriate administrative and technical measures to ensure that we honor Data Subjects' choices regarding the Processing of their Personal Data.

The Notice and Choice Policy provides additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

## 5.2 Personal Data Minimization

HARMAN will limit the Processing of Personal Data to that which is necessary, adequate, relevant, and not excessive for the purposes for which it was collected. Prior to collecting Personal Data, implementing a new system or process that involves Personal Data, or disclosing Personal Data, HARMAN will evaluate whether each category of Personal Data to be collected, used, or disclosed is strictly necessary to accomplish the relevant purposes. Doing so will ensure HARMAN only collects and retains the minimum necessary Personal Data and takes reasonable steps to ensure that Personal Data is adequate, relevant, accurate, current, and reasonably necessary for the specified purposes.

The Privacy by Design Considerations Policy and the Information Retention and Disposal Policy provide additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.3 Purpose Limitation and Access Minimization

HARMAN will create, maintain, and enforce administrative and technical policies and procedures to restrict access to Personal Data to Employees whose roles reasonably require access to such data and ensure such Personal Data is Processed only for its stated purpose.

Employees will not access Personal Data unless they are authorized to do so, including Personal Data of HARMAN's Customers, Third Parties, and Workers.

HARMAN's Privacy by Design Considerations Policy and Information Security Program Policy provide additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.4 Personal Data Processing Inventory

To ensure that HARMAN understands the scope and nature of the Personal Data subject to this Policy and our related obligations, HARMAN will maintain accurate inventories and mappings of Personal Data Processed by HARMAN or on behalf of HARMAN by Third Parties. The inventory will include pertinent details regarding the nature, use, transfer, and disposal of Personal Data.

### 5.5 Data Subject Rights

Data Subjects in an increasing number of jurisdictions have certain rights related to their Personal Data. These may include rights to access, correct, and request deletion of their Personal Data and limit or object to the Processing of their Personal Data. HARMAN will implement appropriate administrative and technical measures to ensure that HARMAN informs Data Subjects of their rights and is able to timely and effectively respond to requests.

The Data Subject Rights Request Policy provides additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.6 Security and Personal Data Breach

HARMAN will implement reasonable and appropriate administrative, technical, and physical measures to protect the confidentiality, integrity, and availability of Personal Data, regardless of whether such Personal Data is in electronic or hard copy form. Detailed information about these measures is provided in the Information Security Program Policy and related policies.

HARMAN will ensure that we have implemented and documented details regarding the unique processes, roles, and responsibilities that apply in the event of a Personal Data Breach. Such processes, roles, and responsibilities will allow HARMAN to satisfy our state, federal, or international Personal Data Breach reporting obligations. HARMAN will periodically test and improve the processes.

HARMAN will ensure Workers are aware of their individual obligations to immediately report any actual or suspected Personal Data Breach.

The Personal Data Breach Policy provides additional details and guidance regarding HARMAN's breach response obligations and Workers' responsibilities.

### 5.7 Privacy Risks Assessments of New Systems

Before HARMAN Processes any new Personal Data or existing Personal Data for a new purpose or in a new way, HARMAN will evaluate the privacy risk to Data Subjects. This includes when HARMAN implements any new information system, application, or technology, including new products. Forms of privacy risk assessments include a Privacy Impact Assessment (PIA), a Data Protection Impact Assessment (DPIA), or Transfer Impact Assessment (TIA).

The Privacy Risk Assessment Policy and Privacy by Design Considerations Guidance provide additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.8 Third-Party Risk Management

Prior to disclosing Personal Data to a Third Party, HARMAN will ensure that the Third Party has implemented appropriate administrative, and technical measures to protect Personal Data and Process

Personal Data in compliance with Data Protection Laws. This includes, where applicable, completing required privacy assessments in conjunction with Legal and DigITal. HARMAN will ensure that contractual agreements with Third Parties who Process Personal Data contain data protection terms that comply with Data Protection Laws.

The Third-Party Risk Management Policy and Information Exchange Policy provide additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.9 International Personal Data Transfers

Data Protection Laws in certain countries (Restricted Country) impose obligations and restrictions on HARMAN when transferring Personal Data to another country. HARMAN will ensure appropriate transfer mechanisms exist before transferring Personal Data outside of a Restricted Country. Appropriate transfer mechanisms may include transferring Personal Data to a country that the Restricted Country deems adequate or using Standard Contractual Clauses or Binding Corporate Rules. HARMAN will also complete (or have completed) any legally required assessments, such as TIAs, in connection with Personal Data transfers.

The Third-Party Risk Management Policy provides additional details and guidance regarding HARMAN's obligations and Workers' responsibilities.

### 5.10 Training

HARMAN will provide annual training for all Workers and, where applicable, function-specific training. The training will include the legal requirements applicable to HARMAN and the policies and procedures contained in the Policy and related policies.

In addition to the training, Workers having questions concerning the contents of this Policy should direct questions to privacy@harman.com, and any Worker who believes that a policy or procedure contained in this Policy has not been followed should contact privacy@harman.com.

# 6 HARMAN Privacy Governance

While all Workers have a responsibility to help ensure that HARMAN complies with our data protection obligations, specific groups, departments, and individuals have unique roles in implementing HARMAN's privacy program. This includes:

- Legal: Legal will be responsible for analyzing and interpreting Data Protection Laws applicable to HARMAN's operations, advising HARMAN regarding associated risks and compliance requirements, developing trainings, and documenting operational requirements in appropriate policies, procedures, and other documentations in collaboration with relevant stakeholders.
- DigITal: DigITal will be responsible for creating and maintaining policies and implementing technical safeguards to support the privacy program and protect Personal Data. DigITal will have primary responsibility for appropriate elements of the privacy program including Personal Data inventories and responding to Data Subject Requests.
- Data Protection Committee (Committee or DPC): The Committee will be responsible for ensuring HARMAN's ongoing awareness and alignment on data protection compliance responsibilities. The Committee will be comprised of specialists in information and data protection regulation as well as at least one member from HARMAN Legal, DigITal, Human Resources, Communications, Procurement, Internal Audit, Marketing, Automotive, and DTS. The Committee will maintain a charter setting forth its responsibilities.
- Data Protection Officer(s) (DPO): HARMAN's DPO, or to the extent required by Data Protection Laws, DPOs, will advise HARMAN regarding data protection requirements and risks associated with HARMAN's operations, monitor HARMAN's compliance with data protection requirements, and respond to inquiries, requests, and complaints from data protection regulators and Data Subjects as appropriate in their jurisdiction of responsibility.

- Human Resources (HR): HR will be responsible for ensuring employees have access to this Policy, related privacy policies, procedures, and privacy notices approved by Legal, including, as appropriate during onboarding. HR will coordinate and monitor periodic privacy training for employees in collaboration with Legal and support Legal with investigations and enforcement procedures, including disciplinary actions for Policy violations.
- Business Units: Each HARMAN Business Unit will be responsible for complying with the obligations in this Policy and the accompanying documentation. Management in each Business Unit will ensure that their employees complete all necessary privacy training.

# 7 Violations and Enforcement

Workers will comply with this Policy, and HARMAN will implement appropriate and ongoing monitoring to verify such compliance.

Any violation of this Policy may result in appropriate disciplinary action, up to and including termination of employment. HARMAN reserves the right to notify the appropriate law enforcement authorities of any unlawful activity and to cooperate in any investigation of such activity. HARMAN does not consider conduct in violation of this Policy to be within any Worker's scope of work, or the direct consequence of the discharge of the Workers' duties. Accordingly, to the extent permitted by law, HARMAN reserves the right not to defend or pay any damages awarded against such Workers that result from a violation of this policy.

Any Workers who are requested to undertake an activity which they believe is in violation of this Policy, should voice their concerns, either verbally or in writing, to any member of HARMAN management as soon as possible.

Workers who believe that HARMAN or other Workers are not abiding by or complying with the terms of this Policy, can contact privacy@harman.com.

# 8 Limitation on Scope of the Policy and Privacy Principles

HARMAN will adhere to this Policy except: (i) in the event of a conflict between this Policy and obligations under applicable law, in which case HARMAN's legal obligations will supersede this Policy and HARMAN will revise the policy accordingly, (ii) in the event of a directive by a court or law enforcement agency of competent jurisdiction, in which case HARMAN will comply with the Policy to the fullest extent possible and may revise the Policy if necessary, and/or (iii) to protect the health and safety of a Data Subject.

# 9 Related Documents

Privacy Policy

Data Subject Rights Request Policy

Privacy by Design Considerations Policy

Privacy Risk Assessment Policy

Notice and Choice Policy

Information Exchange Policy

Incident Reporting and Response Policy

Information Classification Policy

Information Retention and Disposal Policy

Information Security Program Policy

Personal Data Breach Policy

# 10 Approval and Ownership

| Review Approved By | Title | Date | Evidence |
|---|---|---|---|
| Tamika Frimpong | CLCO | | |

# 11 Revision History

| Version | Date | Status | Author | Review Comments |
|---|---|---|---|---|
| 0.1 | 16 Oct 2024 | Final | Aaron Lancaster | Final Version |
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