



## Analogic Employee Privacy Policy

Analogic complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Analogic Corporation has certified that it adheres to the Safe Harbor Privacy Principles of notice, choice, onward transfer, security, data integrity, access, and enforcement. To learn more about the Safe Harbor program, and to view Analogic Corporation's certification, please visit <http://www.export.gov/safeharbor/>

Analogic is sensitive to the need of protecting the personal and private information of applicants and employees. It is Company policy to ensure that unauthorized individuals do not have access to such information. We use appropriate security measures to protect any personal applicant or employee information we store or transmit.

Analogic is in compliance with the HIPAA (Health Insurance Portability Act) and complies with the U.S.-EU Safe Harbor Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries. Analogic has certified its adherence to the Safe Harbor Privacy Principles which demonstrates the adequate privacy protection required by the European Commission's Directive.

Analogic collects and maintains global Human Resource information in Peabody, MA, United States. The information is used for compensation, benefit programs, hiring and internal reporting purposes only. Personal information collected from the European Union will not be shared with any third parties outside the Company.

**Notice:** Employees are asked to provide personal data at hiring, and throughout their employment, for the purpose of compensation, fringe benefits and other Human-Resource-related tasks of the Company. When such data is requested, or as soon as possible thereafter, Analogic will notify its employees about the purposes for which such data is collected and used. We also have informed our employees how to contact us, and about any third parties who may access the personal data.

**Choice:** Analogic will not provide personal data to any other third party or use personal data for any purpose other than that for which the data was originally collected without the prior written consent of the employee. Exceptions are to provide compensation or fringe benefits, or to satisfy government reporting requirements. For sensitive personal data, Analogic will give the employee an affirmative opt-in choice if the information is to be disclosed to a third party or used for a purpose other than the purpose for which it was collected or for which its use was otherwise authorized.

**Onward Transfers:** If personal data is transferred (with the consent of the employee) to third parties acting as an Agent for the Company, such third party will be required to either subscribe to the safe harbor principles or enter into a written Agreement with Analogic requiring the third party to provide at least the same level of privacy protection required by Safe Harbor Principles.

**Access:** All employees have the option to review their own personal data by contacting their local HR representative. As part of the review process, employees can correct, amend, or delete information which is inaccurate. Employees may request to review their personal information by contacting the Human Resource Representative at their location. For any inquiries or complaints regarding personal data, employees should contact their designated HR Representative.

**Security:** Only authorized employees can access personal information.

Access is controlled by a log-on sequence and all system users must identify themselves and provide multiple passwords before access is granted. System security, and specifically developed processes are in place to protect personal information from loss, misuse, and unauthorized access, disclosure, alteration or destruction.

**Data Integrity:** Personal information maintained by the Company will be used for the sole purpose of supporting Company operations and providing employee benefits. Company HR and payroll processes include tasks and procedures to keep personal data accurate, complete, and current.

**Enforcement:** Annual reviews of this policy and these principles will take place as part of the certification process with the U.S. Department of Commerce. Analogic will include internal compliance reviews as part of the Company internal audit process. Employees should forward any complaints or disputes regarding personal data protection to their local HR

Representative. Complaints or disputes that cannot be remedied by the local HR Representative should be forwarded to the Office of Analogic's Privacy Officer located at:

Analogic Corporation  
Attn. Privacy Officer  
8 Centennial Dr.  
Peabody, MA 01960  
USA

Analogic agrees to cooperate with local country data protection authorities to resolve disputes with employees that cannot be remedied directly with those employees.

For more information regarding Analogic's compliance with Safe Harbor Privacy Principles you can visit their website;  
<http://www.export.gov/safeharbor/>