



## PRIVACY NOTICE ALLEGRO MICROSYSTEMS LLC

This Privacy Notice is effective as of September 24, 2020. If a previous version exists, you can find it at the bottom of the page.

Allegro MicroSystems, LLC a Delaware Limited Liability Company, with company registration no.: 2235640 is committed to protecting and respecting your privacy. This Privacy Notice ("Notice") explains what Personal Data we collect, why we collect this Personal Data and how we use and protect it. This Notice refers to all Personal Data we collect and that we could use to personally identify you. Please read this Notice. We are happy to answer any question you may have on this.

In this Notice, "Personal Data" means any information on its own or combined with other information that relates to an identified or identifiable natural person ("Data Subject").

This Notice applies to Allegro MicroSystems, LLC, as well as its wholly-owned direct and indirect subsidiaries and affiliated companies, including Voxtel, LLC, under the corporation Allegro MicroSystems, Inc. ("Allegro"), for which Allegro is a "Data Controller". Notwithstanding the foregoing, if any Allegro affiliated companies have published their own privacy notice, such notice will take precedence over this Notice with respect to that entity. If you have any questions about this Notice, please contact Allegro at its registered address: 955 Perimeter Road, Manchester, NH 03103, United States of America or alternatively you may email us at [privacy@allegromicro.com](mailto:privacy@allegromicro.com). When this Notice refers to "we", "us" or "our", it refers to all Allegro entities which collectively or individually may act as a Controller of your Personal Data, in other words those entities who may be deciding why and how your Personal Data is being processed.

This Notice applies to all Personal Data we collect about you when you:

- Visit our website<sup>1</sup>
- Purchase or use our products, services, applications or solutions;
- Subscribe to our newsletter, product updates and alerts, email notifications or participate in our online communities;
- Attend trade shows or events or contact customer support;
- Interact with us as a job applicant/candidate;
- Request information specific to your interests;
- Engage with us using our social media platforms;
- Give other organizations your permission to share your Personal Data;
- Place your Personal Data in the public domain;
- Attend/visit any of our premises for any business purpose.

### The Personal Data We Collect

We may collect and process various types of Personal Data we receive from you depending upon the way that you interact with us, for example, through our website, our sales team, our customer service team, our career portal, etc. We may collect and process some or all of the following types of information from you:

- Name and last name;
- Email address, postal address, telephone number, fax number, country;
- Other personal information contained in your profile, resume/CV cover letter or in another form provided by you;
- Log-in details (username, password);
- Bank account information;
- Traffic information such as time and/or duration of your interaction with us;

- IP address, Media Access Control (MAC) address of the device(s) you use to interact with us;
- Your actual or assumed location (determined by the information mentioned above);
- Information related to your interests, for example: products or services that you are visiting on our website platforms or discussed with our teams;
- Reviews, feedback, comments;
- Information related to your requests for information, requests for support and your interactions with us;
- Cookies preferences;
- We use third party web analytics services such as Google Analytics, HubSpot and LinkedIn on our Website. The providers of these services may use cookies and other similar technologies to provide these services to us.
- **California Privacy Notice:** If you are an employee or potential candidate of Allegro and a resident of California, you have a right to notice of the types of Personal Data we may collect, and how we use it. We may collect the above indicated Personal Data, and use it for compliance with legal obligations, security and maintenance reasons, and employment purposes such as employment screening, identity verification, direct deposit, etc.

As you navigate through our website, certain information can be passively collected (that is, gathered without your actively providing the information) using various technologies and means, such as cookies, tags, pixels, and navigational data collection.

### **The Way We Use Your Personal Data**

We may use your Personal Data for typical business purposes such as to enable the processing of any orders, providing our products or services, responding to requests, sending information or materials requested by you, for employment purposes, to comply with legal obligations, including in certain instances confirming your right to conduct business with us and cross-checking against certain governmental lists, for security and maintenance reasons, for performance and execution of contracts or with your permission only, contact you in regard to any products or services we may offer now or in the future, improve the efficiency of our Website or track the origin of Website traffic.

Your Personal Data are processed on the basis of at least one legitimate ground which may be, depending on the categories of Personal Data and the purposes of the processing: (i) with your explicit consent (which may be withdrawn at any time); (ii) the performance of a contract with you or pre-contractual steps for a contract with you; (iii) compliance with our legal obligations or (iv) our legitimate interest such as in running our business effectively and in improving the quality of our products and services or the legitimate interest of the third parties to whom we transfer your Personal Data.

### **How We Collect Your Personal Data**

We and our third-party service providers may collect both Personal Data and Other Information from sources including direct interactions, data from third parties, third party collection of information, automated tracking technologies and cookies.

### **Cookies**

In order to offer and provide a customized and personal service, we may use cookies to store and help track information about you.

A cookie is a small text file that we or our third-party service providers may transfer to your device when you visit our website that helps the site remember information about you and your preferences. Cookies retain certain information to help websites recognize a user's device as they navigate from page to page or when they later return to a website.

In general cookies perform four functions:

- Strictly Necessary cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of the site will not then work. These cookies do not store any personally identifiable information.
- Performance cookies allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies we will not know when you have visited our site and we will not be able to monitor its performance.
- Functional cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies then some or all of these services may not function properly.
- Targeting cookies may be set through our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant adverts on other sites. They do not store directly personal information but are based on uniquely identifying your browser and internet device. If you do not allow these cookies, you will experience less targeted advertising.

Please note that the specific types of cookies we use depends on the website you are visiting. For more information about our use of cookies and other similar technologies, including your choices regarding the use of cookies, please see the cookie notice displayed on the website you are visiting.

For information on how Google uses the information obtained from sites or applications that use its services, visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

For general information about cookies, visit [allaboutcookies.org](http://allaboutcookies.org).

### **LinkedIn Insight Tag**

The LinkedIn Insight Tag is a piece of lightweight JavaScript code that we added to our website to enable in-depth campaign reporting and to help us gain valuable insights about our website visitors. We use the LinkedIn Insight Tag to track conversions, retarget website visitors, and unlock additional insights about members interacting with our LinkedIn advertising campaigns.

The LinkedIn Insight Tag enables the collection of metadata such as IP address information, timestamp, and events such as page views. All data is encrypted. The LinkedIn browser cookie is stored until you manually delete it or when the cookie expires. You can opt out of cookies from LinkedIn on your [LinkedIn settings page](#) and we recommend you read their [Cookie Policy](#) for more information.

Your use of third-party websites and platforms such as LinkedIn and the privacy practices of these platforms, are governed by separate terms, conditions and policies for which we are not responsible.

### **Where We Process or Store Personal Data**

Allegro is headquartered in the United States and we store data on servers located in the United States, Europe and Asia. When we transfer Personal Data to third party service providers, including our website hosting providers, we ensure that adequate safeguards are in place to protect the transfer of Personal Data.

### **Third Party Information Sharing**

We do not sell your Personal Data to third parties, including to third-party advertisers.

We may share your Personal Data among Allegro entities, or with our Parent Company (Sanken Electric Co. Limited) and any of our employees, officers, insurers, agents, suppliers, professional advisers or subcontractors around the world for the purposes described in this Privacy Policy. We may also share your Personal Data with third-party suppliers and service providers worldwide for data processing, storage and other services such as website hosting, data analysis, order fulfilment and delivery, carrying out certain cross-referencing against governmental lists where applicable, information technology and related infrastructure provision, marketing communications, customer service, email delivery, credit card and payment processing, auditing and other similar services.

We may need to share your Personal Data with third parties worldwide in order to deliver services or products requested by you in your country.

Furthermore, we may need to share your Personal Data with a third party worldwide in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

We will also share or release information, including Personal Data if (i) we have your permission to make the disclosure, (ii) when we believe release is appropriate or is required to comply with the applicable laws and/or to respond to requests from competent public and government authorities including public and government authorities outside your country of residence, (iii) in connection with any ongoing or prospective legal proceedings, (iv) enforce or apply our Terms of Use and other policies or agreements, or (v) protect the rights, property or safety of Allegro and other users (including for fraud protection and credit risk reduction).

### **How Long We Keep Your Personal Data**

We will only keep your Personal Data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If we delete your Personal Data from our servers, it may be retained on backup media for an additional period of time.

For employment applications made via our career site, your account will be deleted two (2) years after the last time you login unless you become an employee. You can also contact our support team ([privacy@allegromicro.com](mailto:privacy@allegromicro.com)) at any time to get your account deleted earlier.

### **Your Rights in Relation to Your Personal Data**

If you are a resident of the European Union/European Economic Area, you have the following rights with respect to your Personal Data.

- The right to request a copy of your Personal Data that we hold about you.
- The right to request that we correct your Personal Data if inaccurate or out of date.
  - If you are a customer or partner and you have registered a profile on one of our Websites, you may update your user profile by logging into the Website and accessing the Account Information, User Profile or Settings area of the site.
  - If you have registered to use our Career Site, you may update your user profile by logging into the [Career Site](#).
- The right to request that your Personal Data is deleted when it is no longer necessary for us to retain such data.
- The right to request that we provide you with your Personal Data and, if possible, to pass on this information directly (in a portable format) to another Data Controller when the processing is based on consent or contract.
- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your Personal Data.
- The right to object to the processing of Personal Data, in case data processing is based on legitimate interest for the purposes of automated decision making or profiling and/or direct marketing.

For the purposes of this Privacy Policy any automated profiling or decision making is for direct marketing purposes only and therefore does not produce any legal effect concerning the data subject or similarly significantly affect the data subject.

Any query or request about your privacy rights should be sent to [privacy@allegromicro.com](mailto:privacy@allegromicro.com).

To exercise your privacy rights you may submit a Subject Access Request by completing the Subject Access Request Form (SAR), which can be downloaded using the following links as a [Microsoft Word](#) or [PDF file](#). You may submit the completed SAR to [privacy@allegromicro.com](mailto:privacy@allegromicro.com) or print the form and send it to our attention at the appropriate address as detailed in the "Our Contact Details" section of this policy. For any queries about the content or how to complete the SAR please contact us at [privacy@allegromicro.com](mailto:privacy@allegromicro.com).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

### **International Transfer of Personal Data**

Some recipients of Personal Data will be located or may have relevant operations outside of your country, such as in the United States, where the data protection laws may not provide the level of protection equivalent to the laws in your jurisdiction. By entering into appropriate data transfer agreements based on EU Standard Contractual Clauses or taking other measures to provide an adequate level of data protection, we have established or confirmed that data recipients will be provided an adequate level of protection for Personal Data and that appropriate technical and organizational security measures are in place to protect Personal Data against accidental or unlawful destruction, accidental loss or alteration, unauthorized disclosure or access, and against all other unlawful forms of Processing. In addition, our European affiliates have implemented data transfer agreements based on the EU Standard Contractual Clauses to provide adequate protection to transfers of Personal Data transferred to Allegro MicroSystems, LLC in the United States as well as other Allegro entities located outside of the EEA or we take steps to put such agreements in place. For more information about these measures, please email [privacy@allegromicro.com](mailto:privacy@allegromicro.com).

### **Safeguarding the Personal Data**

We recognize our responsibility to protect the Personal Data that we collect. We make sure our measures are in compliance with applicable data protection and data security laws. We have implemented appropriate technical and organizational measures to prevent risks, such as unauthorized disclosure of, or access to Personal Data, loss, alteration, accidental or unlawful destruction of Personal Data. We also ensure our external providers process your Personal Data in a secure and confidential manner. Examples of measures that are in place to protect your Personal Data include:

- Limiting access to Personal Data so that only employees on a need to know basis have access to your Personal Data;
- Limiting physical access to our premises;
- Requiring third-party providers to have acceptable security measures to keep Personal Data secure and putting in place physical, electronic and procedural safeguards in line with industry standards.

Please note that transmissions over the internet are never entirely secure or error-free and we do not guarantee the security of the information communicated to and/or from our websites.

It is your responsibility to safeguard any password, user ID and other Personal Data while using our websites.

Should you become aware of any data security incident, you may report it by emailing [databreach@allegromicro.com](mailto:databreach@allegromicro.com).

## **Minors and Children Under the Age of 13**

Our websites are not directed at, and are not intended for, minors or children under the age of thirteen (13). Allegro will not knowingly collect data from children without proper parental consent. If you believe that we may have collected Personal Data from someone under the age of thirteen (13), or under the applicable age of consent in your country, without parental consent, you can contact us to take appropriate measures to investigate and address the issue promptly. Parents wishing to access, review or delete their child's Personal Data may contact us by emailing [privacy@allegromicro.com](mailto:privacy@allegromicro.com).

## **Marketing Communications**

When you visit our websites, register for an online account with us or enter or make purchases through our websites, subscribe to a newsletter or to product updates, attend a trade fair, enter a contest or other promotion, you may receive marketing communications from us (subject to your consent, where applicable).

## **To Unsubscribe From Our Communications**

You are always free to unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our e-mails or updating your communication preferences.

We shall comply with your request as soon as reasonably practicable. Please note however that we may still send you important administrative and transactional messages (i.e. service notifications) in connection with a transaction, your orders, updates or notifications about products you have purchased from us, or information about your account.

## **Interest-based Advertising**

We use cookies, Web beacons and other similar technologies to show targeted ads on your device(s). These ads, known as interest-based advertising, are more likely to be relevant to you because they are based on inferences drawn from location data, web viewing data collected across non-Allegro affiliated sites over time, and/or other application use data.

## **Automated Decision Making and Profiling**

Automated Decision Making refers to a decision which is taken solely on the basis of automated processing of your Personal Data. This means processing using, for example, software code or an algorithm, which does not require human intervention.

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person.

We use software to help us better understand how you like us to communicate with you and whether you may be interested in our products and services. For example, based on our records that you have recently shown interest in a certain product, our software helps us identify related products and services which may interest you. We may then use this to contact you about these.

## **Marketing automation**

We use HubSpot marketing automation software that uses a tracking code (upon consent) to record your browsing activity across our website including sessions, visitors and page views. The data collected allows us to recognize you when you return to our website and tailor content to your interests to improve your experience. You can opt out by switching off cookies in your browser settings but by doing so our website might not work as you would expect.

## Social Computing

We may provide social computing tools to enable online sharing and collaboration among registered users. These include forums, wikis, blogs, instant messaging and other social media platforms. When registering to use certain social computing tools on our websites, you may be asked to provide certain Personal Data. Such Personal Data and other information collected during the registration of our websites will be subject to this Privacy Policy, except Personal Data and other information that you make publicly available or you communicate to other participants. These tools may also include supplemental terms of use and may include additional privacy notices.

Any content or information (including Personal Data) that you post or make available to other participants on third party social media platforms is subject to the terms of use and privacy policies of those platforms and is not subject to this Privacy Policy.

## Links to Third Party Sites

Links on this Website to third party websites are provided solely as a convenience to you. If you use these links, you will leave this Website. Clicking on these links may allow third parties to collect or share data about you. We do not control 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. If you decide to access any of these third-party websites, you do so at your own risk.

## Our Contact Details

<b>For All Regions (excluding Europe)</b>	Allegro MicroSystems, LLC 955 Perimeter Road Manchester, NH 03103 USA  <a href="mailto:privacy@allegromicro.com">privacy@allegromicro.com</a>
<b>For Europe (excluding Germany)</b>	Allegro MicroSystems Europe Ltd Melita House 124 Bridge Road Chertsey KT16 8LA United Kingdom  European Data Privacy Manager: <a href="mailto:privacy@allegromicro.com">privacy@allegromicro.com</a>
<b>For Germany only</b>	Dr. Rainer Harwardt ORGATEAM Unternehmensberatung GmbH Im Ettenbach 13a 77767 Appenweier Germany  <a href="mailto:dpo-de@allegromicro.com">dpo-de@allegromicro.com</a>

## **Your Right to Complain to a Supervisory Authority**

If you are unhappy with the way in which your Personal Data has been processed, you may in the first instance, contact [privacy@allegromicro.com](mailto:privacy@allegromicro.com).

If you remain dissatisfied, EU residents have the right to apply directly to the relevant competent supervisory authority. The current list of EU data protection supervisory authorities can be accessed here [https://ec.europa.eu/newsroom/article29/item-detail.cfm?item\\_id=612080](https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080).

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<sup>1</sup> For ease of reference “Website” refers to any URLs owned and controlled by Allegro that may exist now or in the future.