

 CORPORATE POLICY	PERSONNEL DATA PRIVACY AND SECURITY POLICY	ENGLISH
	Owner: Vice President, Human Resources	Last Review: 2017.12.18
	Department: Human Resources	

POLICY

Hubbell Incorporated (“the Company”) is committed to protecting the privacy and security of information that is obtained from employees and applicants in connection with employee use of our electronic signature application and access to websites under our operation and control, which includes Hubbell’s Human Resources Information and Payroll Systems accessed through and supported by the myHubb website (collectively, the “Site”).

SCOPE

This policy applies to all employees of Hubbell. Employees governed by a Collective Bargaining Agreement (“CBA”) are limited to the provisions of those agreements. In the event a CBA does not address this topic, this policy will apply to such employees.

PURPOSE

The purpose of this Policy is to outline the Company’s use and protection of electronically stored personnel data collected from employees and applicants and stored on the Company’s Human Resources Information and payroll systems (collectively “HRIS”).

USE OF PERSONNEL DATA

The Company is authorized to collect, use, access, transmit, store, process and disclose the information it obtains through personnel activities, including but not limited to the personal information employees submit in connection with their employment or intended employment as permitted by law. This includes the use, access, transmittal, storing, processing, and disclosure of employee information by and among the Company’s affiliate partnerships and subsidiary companies, as required, regardless of location. Examples of personal information collected in connection with employment or application for employment may include: employee name, phone number, cell phone number, e-mail address, physical/ mailing address, title, employment history, education, job qualifications, date of birth, social security or other national ID number, and other relevant personal data. Hubbell employees and applicants are provided direct access to update personnel data, electronically sign personnel related documents through access to the myHubb website (the Site).

Except as otherwise provided by this Policy, the Company’s employees, associates, human resources staff, managers and their designees, consultants and/or other service providers affiliated with the Company who are involved in human resources, supervisory, finance, or pay processing functions and website administration or maintenance will be the only individuals or entities with access to employee personal information, except as otherwise provided by this policy or as permitted by law.

The Company may disclose employee personal information if required to do so by law, to governmental or quasi-governmental requests, or a regulatory organization, or to relevant third parties such as website technicians, brokers, auditors, lawyers, or professional advisors.

The Company may retain employee information as long as necessary and appropriate to comply with applicable legal standards. This information may be transferred into our human resources system and used to manage employment, may become part of employee personnel file and may be used for other employment/work-

related purposes. Employee personal information will be destroyed in accordance with the Company's record retention policy.

At no time will the Company sell, rent, lease, or license employee information to a third party. Nor will employee information be used for marketing purposes by any third party vendor, unless employees specifically agree to such use.

The Company may share employee personal information with selected service providers or consultants acting on its behalf, in order to operate its website and in order to complete routine Human Resources activities, including, but not limited to, payroll processing, benefits and leave administration, performance management, and talent planning. Third parties given access to personal information will be required to protect employee personal information. Such third parties include SAP SuccessFactors, who maintains the Company's core HRIS website, its payroll processor, ADP, its benefit providers, including, Alight, T. Rowe Price, Fidelity, and Metlife, and additional vendors including DocuSign, OnBase, and Sterling Talent Solutions.

SECURITY OF ELECTRONICALLY STORED PERSONNEL DATA

Hubbell considers the security of employee personal information a top priority. Accordingly, any personal information that employees share with the Company is kept strictly confidential and fully secure. The Company secures personal information from unauthorized access, use or disclosure.

Included in Hubbell's operating system is the capacity to allow only secure connections by end users. Via SAP SuccessFactors, the Company secures the personally identifiable information employees provide via computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When employees submit a form or data, the encrypted (encoded) information is protected using "Secure Socket Layers (SSL)" as it passes between the user's browser and the Company's servers. SSL technology is the most widely used data encryption coding system for secure transactions. It is the leading security protocol on the Internet and is commonly used in Internet applications that require security and privacy for sensitive data. Only authorized persons are permitted to access the information submitted.

ADMINISTRATION

Roles and Responsibilities

Human Resources has responsibility in overseeing this policy and procedure.

Monitoring, Evaluation and Review

This policy and procedure will be reviewed annually.

Exceptions

Exceptions to this policy require written approval from the Vice President, Human Resources.

ACCOUNTING AND DISCLOSURE

Not applicable

REPORTING

Not applicable

DEFINITIONS

KEY WORDS

data, personnel, privacy, security, confidential

RELATED DOCUMENTS (Policies, Guidelines, Standards):

<u>Version</u>	<u>Approval</u>	<u>Effective</u>	<u>Changes</u>
1	A. Hsieh, S. Mais, J. Capozzoli	2017.12.18	