

Global Employee Privacy Notice

Scope: This Global Employee Privacy Notice (“Privacy Notice”) describes how Tyco and its affiliates worldwide (“Tyco” or “we”) collect and use personal data about you as a current, past or prospective employee of Tyco (“employee”, “employees” or “you”). Tyco collects data from employees in order to execute, administer, and manage its human resources systems and programs, business processes and internal controls, safety and security programs, ethics and compliance programs, training programs, internal audit requirements, and to comply with legal obligations. This Privacy Notice provides a general notice to employees to establish a consistent understanding of Tyco’s business practices regarding the personal data of our employees. Additional Information about applicable local law may be provided in a Guidance Note published in the local language version of this Notice.

Personal Data We Collect:

- As part of our employment relationship with you, we may collect personal data such as the following **where permitted by local law:**
 - General Employment Data: including your name, address, contact information and date of birth;
 - Business Personal Data: including your business title, business contact information, representations of your place in the business organization and business systems that you are authorized to use;
 - Remuneration and Benefits Data: including your salary, salary grade, application for and use of your corporate credit card, health and other benefits you may be entitled to; and
 - Sensitive Personal Data: including your racial or ethnic origins, political or religious beliefs, trade union membership, and health information. **We will collect such data only where permitted by law, if needed and with your explicit consent where required. ****

Uses of Your Personal Data:

- We use your personal data in order to comply with our legal obligations and to **execute**, administer and manage our:
 - Human Resources Systems and Programs: to provide the employment services necessary to fairly evaluate and compensate employees and adhere to applicable employment laws;
 - Business Processes and Internal Controls: to facilitate the efficient day-to-day running of business operations;
 - Safety and Security Programs: to ensure the safety and protection of employees, resources, and communities;
 - Ethics and Compliance Programs: to manage compliance with Tyco’s Guide to Ethical Conduct, policies and programs and applicable laws;
 - Training Programs: to provide instructional materials, and record participation and evaluations;
 - Internal Audit and Governance Requirements: to manage Tyco’s internal audit programs and compliance with applicable standards and laws.
- On occasion, we may have a business need to use information for a purpose not originally considered at the time of first collection. In these cases, we will provide notice of the new purpose to you.
- For certain employee services, telephone calls may be monitored, recorded, stored and used for training purposes and to improve the quality of our customer service. Such recordings will always be conditioned upon your consent.
- We may also use data that we have collected about employees to conduct activities in connection with government or regulatory investigations or audits, and actual or prospective legal proceedings or claims.

Access to Your Personal Data:

- Tyco expects employees to manage changes to their personal information in order to keep the data we process accurate. You can do this by logging in to your accounts for on-line Human Resources systems we use or by contacting your local Human Resources Manager.
- You may also make a written request to access your personal data in order to verify its accuracy, completeness and the purposes for which it is being processed.
- Tyco will not keep your personal data for longer than is relevant for our business purposes or as otherwise required to comply with the law.

Transfers to Others:

- As a global corporation listed on the New York Stock Exchange, personal data on Tyco's worldwide employees is transferred to and may reside in the United States or elsewhere. In addition, your personal data may be processed by or transferred to other Tyco entities.
- Your personal data is also shared with suppliers, business partners, contractors, or other third parties who process data on behalf of Tyco within the scope of the purposes mentioned in this Privacy Notice. Tyco also may be required to disclose personal data to other third parties if we file bankruptcy, or there is a transfer of assets or ownership in connection with proposed or consummated corporate reorganizations, such as merger, acquisition, sale or other disposition of business units.
- It is Tyco's policy to ensure an adequate level of protection for employment data that is processed or transferred between Tyco entities and that our suppliers, business partners, contractors, or other third parties adequately protect the information entrusted to them by Tyco.

Security:

- Tyco takes appropriate precautions to restrict access to the personal data of our employees to only those who need to know that information.
- We maintain appropriate measures to protect the data from loss, misuse or inadvertent destruction.
- Information privacy is the responsibility of every employee at Tyco. Employees must adhere to all information security, data privacy and records retention policies.
- Employees must immediately report any breaches of privacy or security to the Chief Privacy Officer or Chief Information Security Officer by sending an email to tycopolicy@tyco.com.

Other Important Information:

- Tyco recognizes the importance of privacy for our employees and will enforce the privacy and security policies of Tyco.
- Tyco's Personal Data Protection and Privacy Policy ("Global Privacy Policy") advises employees of their responsibilities to respect and protect the personal data they collect or maintain on behalf of Tyco. A copy of our Global Privacy Policy can be found on Yammer
- You may address any concerns regarding uses of your personal data to Tyco's Chief Privacy Officer through the Tyco ConcernLine, www.VitalTycoConcerns.com or www.EUVitalTycoConcerns.com. Questions should be made to your HR Manager or Data Protection Officer.
- Contractual arrangements with our suppliers and business partners ensure any third parties respect and protect the personally identifiable data they collect and maintain on behalf of Tyco.
- If you are employed at Tyco in the European Economic Area, please note that your employer is the controller with regard to the processing of your personal data as defined in the European Directive on Data Protection (1995/46/EC), unless specifically stated otherwise.
- Any questions regarding Tyco's Data Protection and Privacy Program should be directed to the Chief Privacy Officer by e-mailing: tycopolicy@tyco.com.
- This Privacy Notice is effective from November 10, 2011 and is maintained by the Chief Privacy Officer.

**** Explicit consent is always required when collecting sensitive personal data in the EEA or regarding EU citizens.**