

Data Privacy Notice and Consent

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding information submitted through this system, as well as consent to certain terms and conditions regarding the information submitted by that person. Because you have indicated that you either live in or are reporting about a matter that occurred in a country with such regulations, you are being asked to read and accept the terms contained in the Consent below. If you do not wish to accept the terms below, we are unable to accept any information through this system and would ask that you please report this matter to your local Management, Human Resources, the Law Department or Regional Compliance Officer instead.

The Ethics hotline site is a confidential online reporting system operated by EthicsPoint and provided by Ingram Micro to allow you to ask questions and to report incidents. Use of the Ethics hotline site is entirely voluntary. If your concern pertains to issues not listed, you are encouraged to report them to local management or through our other established reporting channels.

Before proceeding further, please read the notice below and, if you agree, check the consent box that follows. You will then be able to submit a report or question on the Ethics hotline site. If you do not provide your consent, you will not be able to proceed through to submitting a report or question.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that, to the best of your knowledge, is correct. While you will not be sanctioned for submitting information in good faith, even if it later turns out to be incorrect, knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially and we encourage you to identify yourself in order for us to follow up with questions we might have.

What Information is collected? The Ethics hotline captures the following information directly from you: your name and contact details, any question you may have, the name and title of all individuals you may be reporting, and a description of any questionable conduct, including all relevant details.

How will the Information be used? All the information will be stored on the Ethics hotline site database hosted by EthicsPoint, Inc. in the USA ("EthicsPoint"). EthicsPoint adheres to the Safe Harbor Principles. However and considering the decision of the European Union Court of Justice dated Oct. 6, 2015 and the subsequent decision of the Swiss data protection regulator dated Oct. 22, 2015, which have both declared the Safe Harbor Principles invalid, EthicsPoint and Ingram Micro executed a Data Processing Agreement that incorporates the European Commission's standard contractual clauses (sometimes referred to as model clauses) which shall apply to the transfer of data from the EU/Switzerland to the US until such time an agreement is reached between the EU, Switzerland and the US on a new Safe Harbor framework. Unless otherwise required by law, the information in the Ethics hotline site database may only be reviewed and used by those individuals who need to access the data to fulfill their job duties. These individuals may include appropriate Ingram Micro human resources, audit, legal, security, or management functions and employees, or technical staff at EthicsPoint. Those individuals may be located in the United States. In addition, all information you provide may be stored by Ingram Micro in the course of answering your question(s) or investigating the report.

Ingram Micro will evaluate the information you provide, and may conduct appropriate investigations, and take corrective action.

Please note that because of applicable laws, individuals you identify through the Ethics hotline site may be informed about the fact that a report has been made. However, the information you provide will not reveal your name or identity. In addition, all such individuals you identify will have the right to respond to or correct information you reported.

Any information you submit that is not needed to answer your question or for the investigation of any incident will be deleted or archived, as permitted by local law. In addition, once we have responded to your question or completed any investigation, all information you submitted will be deleted or archived, as appropriate and permitted by local law. Ingram Micro will take adequate technical, organizational, and legal steps to secure the information you provide. Ingram Micro also requires EthicsPoint to adequately secure your personal data and not use it for any unauthorized purposes.

I have read and agree with the contents of the Ingram Micro Data Privacy Notice and Consent form above.