

eCUSTOMER POLICY

1.0 PURPOSE

The purpose of this policy is to support the enforcement of _____ (“Company”)’s Privacy and Data Protection Policy (“Corporate Policy”) which is to control access to Company’s customers contact information and other personal data collected and stored within Company’s systems and processes. The policy should be referenced at the web site provided. The intent is not to restate the policy as part of the E-Customer PMO, but to create awareness that the Corporate Policy exists and help the E-Customer program adopt and adhere to the Corporate Policy.

2.0 SCOPE

- 2.1 All customer contact information and other personal data collected, stored and communicated by Company and its employees are subject to this policy. The entity of “Owner” is defined as an individual about whom personal data is collected or otherwise processed and “Personal Data” is defined as any data that enables identification of an individual. Refer to the Corporate Policy for further explanation and definitions.
- 2.2 This policy applies to all countries.
- 2.3 This policy does not apply to Personal Data regarding Company employees or prospective employees. This is covered by the Employee Data and HR Policy.
- 2.4 This policy applies to all individual end-users, customers, prospective customers, online visitors and business partners whose personal data is collected or otherwise processed via electronic means.

3.0 DESCRIPTION

- 3.1 The Corporate Policy is very specific regarding what information can be captured for an Owner.
- 3.2 No Personal Data may be collected from the Owner without the Owner’s knowledge. This will generally be by Opt-in, except where Opt-out is permitted. Refer to Section 6 of the Corporate Policy.
- 3.3 Personal data must be made available to Owners for their review and update in methods defined by the *Corporate Privacy Policy*.
- 3.4 Each Owner must validate that they are who they say they are.
- 3.5 All processes and systems which capture new contact/Owner information or individual end-customer information must also capture permitted use of data as identified by the Owner, the opt-in or opt-out date and identify how the contact information was captured from the Owner.

- 3.6 New Owner or Individual End-customer Information must be added to the E-Marketing Global Owners Repository at the time of normal cycling.
- 3.7 All requests to share Owner or Individual End-User Information with 3rd Parties must be submitted to the E-Marketing team for processing and approval. Only the E-Marketing team has the authority to share this information.

4.0 ACCESS

4.1 Company Employee Access

Access to Owner or Individual End-User Information by Company employees should be granted to only those with a need to know it. Only those Company employees in the following business functions should be granted access:

- Customer Advocacy
- Channels
- Corporate Marketing
- Customer Satisfaction
- Customer Service
- Customer Success Eng.
- Customer Support Eng.
- Engineering
- Finance
- IBSG
- Information Security
- Information Technology
- Legal Services
- Marketing/CMO
- Manufacturing
- Sales
- Strategic Alliances

4.1.1 A disclaimer must be presented and agreed to by the Company employee requesting contact information from the CR.

4.1.2 Please refer to the Corporate Policy sections on Processes/Records to Keep (Section 15.0), Data Retention and Cleaning (Section 16.0), and the section on Corporate Databases for additional access and retention privacy policies.

4.2 Owner Entitlement and Access

All Owners of personal data must receive entitlement to only their Personal Data.