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## Philips Privacy Code

In view of the *OECD Guidelines on the Protection of Privacy and Transborder Flows of Personal Data*, the *Philips General Business Principles*, and the *Philips Sustainability Policy*, Philips shall process Personal Data of Individuals according to the following privacy principles, which are further detailed in the internal Philips Privacy Rules for Employee Data and the [Philips Privacy Rules for Customers, Suppliers and Business Partners Data](#) respectively, as well as in sub-policies and notices:

### Safe Haven

Philips and its Group Companies and staff shall process Personal Data of its Customers, its Employees and other Individuals fairly and in accordance with applicable legislation and this Code, therefore creating a 'Safe Haven' in which Personal Data can be transferred between Philips Group Companies around the world within the boundaries as set forth by this Code, the respective Privacy Rules and applicable law.

### Purpose Specification

Personal Data shall be processed for Philips legitimate business purposes, including its employment and marketing activities as well as its control and security measures or for compliance with its legal obligations.

### Collection and Use Limitation

The collection and processing of Personal Data shall be limited to the business purposes and to business purposes which are not incompatible with those original business purposes. Personal Data shall be reasonably adequate for and relevant to the applicable business purposes and not be excessive.

### Sensitive Data

Philips shall restrict the processing of Sensitive Data (like race, ethnic origin, health, religion, political opinion, or sexual preference) to the business purposes stated in the respective Privacy Rules and purposes required or authorized by law or consented to by the Individual.

### Data Quality

Personal Data shall be accurate, complete and kept up-to-date to the extent reasonably necessary for the applicable business purpose.



## Confidentiality and Security

Philips shall take appropriate and commercially reasonable technical, physical and organizational measures to keep the Personal Data confidential and secure and to protect the Data against all unlawful forms of processing.

## Transparency

Philips shall inform the Individual about the purposes of the processing, and other relevant information insofar as this is necessary to ensure fair processing.

## Disclosure to Third Parties

Philips shall disclose Personal Data to a Third Party where necessary for the applicable business purpose or where required by law. (Please consult with the appropriate Privacy Rules for more detail)

## Employees

While performing its rights and duties as an employer, Philips shall take into account the (privacy) interests of its Employees with regard to the processing of their Personal Data, the monitoring of their performance, attendance and behavior, and their private life.

## Direct Marketing

Philips will allow the Individual to make choices with respect to receiving marketing communications and will respect such choices.

## Protection of Children

Philips will Process the Personal Data of a child only in compliance with applicable law. Where appropriate, Philips will seek the consent of the parent or legal guardian of the child.

## Rights of Individuals

Philips respects the rights of Individuals to request an overview of their Personal Data processed by or on behalf of Philips. The Individual can request to rectify, to delete or to block his Personal Data and object to the processing of his Personal Data, and Philips will follow up in accordance with the procedures as defined in the Philips Privacy Rules for Employee Data and the Philips Privacy Rules for Customers, Suppliers and Business Partners.

## Final provisions

This Code is binding on all Companies belonging to the Philips Group and shall be applied without prejudice to applicable legislation.

All Group Companies and Staff as well as all Data Processors and their staff are required to cooperate and assist each other in order to handle a request, complaint or claim of an Individual, or a lawful investigation or inquiry by a competent authority.

The Board of Management of Koninklijke Philips Electronics N.V.

Amsterdam, August 12, 2008.

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**Note**

It is Philips objective to bring all data processing into compliance with this Code before December 31, 2013.

**Considerations to the Philips Privacy Code**

1. Philips wishes to express its commitment to the protection of the right to privacy and protection of Personal Data of Individuals in accordance with its General Business Principles and its Sustainability Policy;
2. Philips acknowledges the Privacy and Data Protection Principles as laid down in Guidelines on the Protection of Privacy and Transborder Flows of Personal Data of the Organisation for Economic Co-operation and Development (OECD September 23, 1980), which are: Fair Processing, Purpose Specification, Collection and Use Limitation, Transparency and Openness, Data Quality, The Right of Individuals to request Access to or Correction of their Personal Data or to Object to the processing of their Personal Data, Information Security, and Accountability;
3. Philips processes Personal Data of its Employees, its Customers, Suppliers, Business Partners and other Individuals as appropriate in connection with its business activities including without limitation its employment and marketing activities as well as its control and security measures;
4. Philips acknowledges that for the interests of a Customer to be effectively protected, the Customer should be able to make his choices and preferences known to Philips;
5. Philips acknowledges that the nature of the employment relationship requires special attention of Philips as an employer to the (privacy) interests of its Employees with regard to the processing of their Personal Data, the monitoring of their performance, attendance and behavior, and their private life;
6. Philips acknowledges that children need special protection in connection with the processing of their Personal Data;
7. The processing of Personal Data by Philips may include exchanges of Personal Data between Group Companies, central storage of Personal Data within or outside Philips and the transfer of Personal Data across borders of countries or states.

**Philips Privacy Office**

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or to the local Privacy Officer, GBP Compliance Officer or Legal Department