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EFFECTIVE DATE: April 19, 2024	APPROVED BY: Chief Legal Officer

PURPOSE

The purpose of this Privacy Policy is to provide principles and guidelines that determine the way in which Littelfuse handles and protects Personal Data. This Privacy Policy defines the duties and responsibilities in the area of protecting Personal Data and informs Data Subjects about Littelfuse Processes with respect to Personal Data.

SCOPE

Personal data shall be Processed at Littelfuse in accordance with national and international privacy legislation and regulations on data protection, privacy and security.

This Privacy Policy applies to Littelfuse, Inc. and its Subsidiaries and sets out requirements that apply to Littelfuse when Processing Personal Data or developing applications that will Process Personal Data.

RESPONSIBILITY

The Chief Legal Officer has responsibility for maintenance and review of this Policy.

POLICY

This Privacy Policy relates to Personal Data of, for instance, employees, former employees, family members of (former) employees, temporary workers, self-employed persons, job applicants, contact persons of suppliers, customers and other business relations and visitors to Littelfuse premises and of its various websites. This Privacy Policy applies to all Personal Data Processed by Littelfuse. Littelfuse attaches great value to handling this Personal Data in accordance with the principles relating to the Processing of Personal Data. Littelfuse is committed to Processing Personal Data in a lawful, fair, and transparent manner, correct and with due care.

Littelfuse may amend this Privacy Policy from time to time. The most current version of this Privacy Policy, as published on the my.littelfuse.com intranet under Policies, is effective and applies directly to all employees of Littelfuse. Violation of this Privacy Policy by employees of Littelfuse can result in disciplinary measures.

PROCEDURE

Definitions

In this Privacy Policy the capitalized terms below have the following meaning in line with and in addition to the General Data Protection Regulation:

- **Branch Office**; any affiliated entity of Littelfuse, Inc. in the Littelfuse group;
- **Controller**: a person or an organization that determines the purposes and the manner in which Personal Data is Processed;
- **Data Subject**: the person to whom the Personal Data and Special Personal Data relates;
- **General Data Protection Regulation** or **GDPR**: regulation (EU) 2016/679 of the European parliament and of the council of April 27, 2016 on the protection of persons with regard to the Processing of Personal Data and on the free movement of such data which applies from May 25, 2018, and any future versions of this regulation;

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- **Littelfuse:** Littelfuse, Inc. and its Subsidiaries all over the world, jointly as well as each one individually, with the exception of Subsidiaries designated by the Chief Legal Officer of Littelfuse, Inc. to which this Privacy Policy shall not apply;
- **Personal Data:** any information relating to a person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, ID number, location data, IP address or other online identifier or to one or more other factors specific to the person's identity. For clarity, Personal Data includes Personal Data that is publicly available and excludes Personal Data that has been irreversibly anonymized so it is no longer possible to re-identify a Data Subject from the information, taking into account all means likely and reasonably to be used by the Controller or anyone else to re-identify them;
- **Personal Data Breach:** any security infringement leading to an accidental or illegal destruction of, a loss of, alteration to, unauthorized disclosure of, or access to any Personal Data and Special Personal Data being Processed by or on behalf of Littelfuse;
- **Privacy Point of Contact:** Littelfuse internal supervisor of the lawful Processing of Personal Data and Special Personal Data to whom data privacy related issues should be addressed;
- **Process, Processing:** to perform any operation or set of operations on Personal Data and Special Personal Data or on sets of Personal Data and Special Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction;
- **Processor:** a company that Processes Personal Data and Special Personal Data on behalf of a Controller;
- **Profiling:** any form of automated Processing of Personal Data evaluating personal aspects relating to a person, to analyze or predict the Data Subject's performance at work, economic situation, health, personal preferences or interests, reliability or behavior, location or movements, where it produces legal effects concerning him or her or similarly significantly affects him or her.
- **Special Personal Data:** Personal Data as defined in Section 9 of the GDPR, including, but not limited to:
 - Personal Data revealing someone's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership
 - genetic data or biometric data Processed for the purpose of uniquely identifying someone
 - data concerning health
 - data concerning someone's sex life or sexual orientation.
- **Subsidiary:** A company controlled directly or indirectly by Littelfuse Inc. through the ownership of greater than 50 percent of its voting stock.
- **Supervisory Authority:** any competent public body responsible for monitoring and enforcing compliance with privacy law.

Littelfuse Privacy Policy

Littelfuse shall comply with the requirements in this section 3 when Processing or having Processed Personal Data.

Clause 1 - What Personal Data is Processed by Littelfuse

Littelfuse Processes Personal Data of, for instance, employees, former employees, family members of (former) employees, temporary workers, self-employed persons, job applicants, contact persons of suppliers, customers and other business relations, and visitors of its premises and of its various websites.

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Personal data Processed by Littelfuse can relate to (not exclusively):

Type of data
Name and (e-mail)address details
Date and place of birth
Bank account numbers
Log-in codes and passwords
Salary details
Data regarding an occupational disability
Citizen Service Number / Social Security Number
Camera footage
IP-address details of website visitors

Special Personal Data

Some Personal Data Processed by Littelfuse qualify as Special Personal Data under the GDPR. In addition, Littelfuse also Processes unique Personal Data such as personal identification numbers, if there is a legal ground that permits this.

Copy of identity document

Identity documents contain Special Personal Data, such as the combination of a photograph, name and a personal identification number. As a result, Processing identity documents results in extra risks for Data Subjects. Littelfuse only retains copies of identity documents (identification card, passport or driving license) of Data Subjects if the Processing of these documents is necessary to comply with a legal obligation to which Littelfuse is subject.

When identifying persons and Processing information from identity documents, Littelfuse shall adhere to the requirements of applicable local law.

The Processing of the above-mentioned identity documents and/or any Special Personal Data by Littelfuse shall be undertaken with appropriate protections and due care.

Clause 2 - Legitimate grounds for Processing Personal Data

Littelfuse only Processes Personal Data if there are one or more of the legitimate grounds set out below, which allow for compliant Processing of such Personal Data:

- 1 The Data Subject gave consent for the Processing.
 Personal data can be Processed if the Data Subject has freely given specific, and informed consent (preferably in writing or via e-mail) relating to the specific Processing for which consent must be asked. Littelfuse shall ensure that the Data Subjects are adequately informed about the Processing purposes and resources before consent is requested. If there are multiple Processing purposes, separate consent shall be required for each Processing type. In order to fulfil its legal obligations, Littelfuse shall store evidence of the consent provided by the Data Subject.

Processing for which the consent of the Data Subject is required includes (but not exclusively):

- a. Processing Personal Data of persons below the age of 16; consent for this must be given by the parent(s)/guardian(s);
- b. sending newsletters regarding business relations;
- c. use of certain cookies on websites.

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Littelfuse shall allow Data Subjects to withdraw previously granted consent at any time in the same simple manner the consent was given. Withdrawing the previously granted consent does not affect the lawfulness of the Processing immediately prior to the moment the consent has been withdrawn.

- 2 The Processing is necessary for carrying out an agreement to which the Data Subject is a party or for taking pre-contractual measures in connection with a request by the Data Subject and which are necessary for entering into an agreement.

Littelfuse Processes Personal Data based on this ground. This is for instance (but not exclusively) the case when Processing Personal Data for:

- a. employment contracts;
- b. accounts payable / accounts receivable, including any debt-collection process;
- c. (customer) relationship management and information provision;
- d. conducting pension, tax, and insurance administration.

- 3 The data Processing is necessary in order to comply with a legal obligation to which Littelfuse is subject.

For example, Littelfuse may store identity documents of employees and such identity documents and Personal Data therein may have to be disclosed if demanded by a judiciary, tax or other authority.

- 4 Data Processing is necessary to serve a vital interest of the Data Subject or of another person.

This applies for instance in a situation of medical emergency in which the Data Subject is involved.

- 5 The Processing is necessary for the purposes of a legitimate interest of Littelfuse or of a third party to whom the data has been provided, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject which require protection of Personal Data.

The following additional requirements apply to this ground:

- without Processing the specific Personal Data concerned, Littelfuse or the third party (contracted by Littelfuse) cannot properly carry out its activities;
- Littelfuse / the third party has no reasonable alternatives at its disposal to achieve its legitimate interest;
- the infringement of the rights of the Data Subject (right to protection of privacy) does not exceed the interest of Littelfuse/the third party. Littelfuse shall perform a balancing test to assess which legitimate interest prevails. In performing this balancing test, Littelfuse shall seek guidance from recommendations of data protection authorities, including the Article 29 Working Party. Annex 1 to this Privacy Policy provides a schedule which shall form the basis of such a balancing test.

Examples of a legitimate interest of Littelfuse are (not exclusively):

- a. Littelfuse carrying out regular business activities;
- b. prevention and investigation of fraud and/or (suspected) legal offences;
- c. guarantee the rights, liberties, health, or safety of employees of Littelfuse or third parties.

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Clause 3 - Purposes of Processing of Personal Data

Littelfuse shall only Process Personal Data and Special Personal Data for the purpose(s) for which it has obtained the Personal Data and Special Personal Data, unless Littelfuse reasonably considers that it needs to use the Personal Data and Special Personal Data for another reason and that reason is compatible with the original purpose. Littelfuse shall clearly describe and inform the Data Subjects of the Processing purposes. If Littelfuse decides to use Personal Data for an unrelated purpose, it shall notify the Data Subject and explain the legal basis that allows such use.

Littelfuse Processes Personal Data for the following purposes (not exclusively):

- a. personnel and payroll accounts;
- b. executing pension agreements;
- c. accounts payable / accounts receivable;
- d. relationship management and information provision;
- e. information provision concerning the developments of Littelfuse, its services and products;
- f. the improvement of the website and services of Littelfuse;
- g. management information;
- h. determining the business strategy;
- i. carrying out internal audits or investigations and the implementation of audit measures for internal management;
- j. preventing and detecting actual or attempted unlawful and/or criminal behavior towards Littelfuse, its customers and employees, and preventing fraud;
- k. fulfilling legal obligations.

Clause 4 - Data minimization and accuracy

The Processing of Personal Data and Special Personal Data shall only take place in a way that is necessary for achieving the purpose(s) for which the data has been obtained or if the secondary (new) purpose is to be found sufficiently related to the original purpose as described in Clause 3 of this Privacy Policy. This means that:

- a. Littelfuse shall collect and Process Personal Data and Special Personal Data that is adequate, relevant, and limited to what is necessary in relation to the purpose for which the Personal Data is Processed (data minimization);
- b. Littelfuse shall take reasonable steps to update, correct, complete, or delete (as appropriate) any Personal Data shown to be out of date, inaccurate, or incomplete, to the extent required by applicable privacy laws (accuracy).

Clause 5 - Data subjects' rights to access, rectification, erasure, restriction, objection, and portability of Personal Data

If a Data Subject exercises a right under applicable privacy law and requests Littelfuse to take action in connection with such exercise, Littelfuse shall respond by taking any action required by the relevant privacy law, unless the request is unfounded or excessive.

Littelfuse shall only honor a Data Subject's request to exercise its rights under this clause after having identified the Data Subject through proper identification procedure.

Request for access

Every Data Subject has the right to request Littelfuse for a copy of his/her Personal Data and Special Personal Data Processed by or on behalf of Littelfuse. Littelfuse shall respond in writing within one month of receipt of the request. Depending on the complexity and the number of

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requests, Littelfuse is entitled to extend this period by two additional months. The Data Subject shall be informed by Littelfuse of any such extension within one month of receipt of the request, together with the reasons for the delay. Insofar as this is reasonably possible, this copy shall contain the following information:

- a. a summary of the Data Subject's Personal Data Processed by Littelfuse;
- b. a description of the purpose or the aims of the data Processing;
- c. the categories of Personal Data and Special Personal Data to which the Processing relates;
- d. any third parties who received the Personal Data and Special Personal Data;
- e. if available, information regarding the origin of the Personal Data and Special Personal Data;
- f. the estimated period for which the Personal Data and Special Personal Data will be stored, or the criteria used to determine that period;
- g. the rights of the Data Subject regarding rectification, erasure, restriction, and objection to the Personal Data and Special Personal Data being Processed;
- h. the right to lodge a complaint with a Supervisory Authority.

Request for rectification and/or erasure

If Personal Data and Special Personal Data Processed by Littelfuse is inaccurate, incomplete, no longer necessary for the purposes they were collected for, Processed contrary to applicable legislation and regulations, or if consent as mentioned in clause 2 is withdrawn and there is no other legal ground for the Processing, the Data Subject is entitled to have his or her Personal Data and Special Personal Data rectified, completed, or erased by Littelfuse.

Littelfuse shall respond in writing to a request from a Data Subject for rectification and/or erasure within one month of receipt of the request. Depending on the complexity and the number of requests, Littelfuse is entitled to extend this period by two additional months. Littelfuse shall inform the Data Subject of any such extension within one month of receipt of the request, including the reasons for the delay. In the event of a request to for erasure of the Personal Data and Special Personal Data, Littelfuse shall take reasonable steps to inform Controllers or Processors, to whom it has transferred the Personal Data, of such request.

Request for restriction

Every Data Subject has the right to restrict the Processing of his/her Personal Data and Special Personal Data if:

- a. the Data Subject questions the correctness of the Personal Data and Special Personal Data;
- b. the Processing is unlawful and the Data Subject objects against erasure of the Personal Data and Special Personal Data, and instead requests the restriction of the Processing;
- c. Littelfuse no longer needs the Personal Data for the purposes of the Processing, but they are required by the Data Subject for the establishment, exercise, or defense of legal claims; or
- d. the Data Subject has objected to the Processing pursuant to this clause pending the verification whether the legitimate grounds of the Controller override those of the Data Subject.

Littelfuse shall respond in writing to a request from a Data Subject for restriction within one month of receipt of the request. Depending on the complexity and the number of requests, Littelfuse is entitled to extend this period by two additional months. Littelfuse shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

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Objection by the Data Subject

In addition, the Data Subject is entitled to object to the Processing of his or her Personal Data and Special Personal Data if the respective Processing is based on the legitimate interest ground mentioned in clause 2(5). Littelfuse shall respond in writing to a request from a Data Subject objecting against Processing based on legitimate interests within one month of receipt of the request. Depending on the complexity and the number of requests, Littelfuse is entitled to extend this period by two additional months. Littelfuse shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

Littelfuse may reject the objection if it can demonstrate compelling legitimate grounds for the Processing that override the interests, rights, and freedoms of the Data Subject or for the establishment, exercise, or defense of legal claims.

Right to portability of Personal Data and Special Personal Data

Every Data Subject has the right to request Littelfuse to provide his or her Personal Data and Special Personal Data, which Littelfuse shall provide in a structured, commonly used and machine-readable form to the Data Subject or, if technically possible, to transfer the Personal Data and Special Personal Data in an electronic form directly to a Controller appointed by the Data Subject. Littelfuse shall respond in writing within one month of receipt of the request. Depending on the complexity and the number of requests, Littelfuse is entitled to extend this period by two additional months. Littelfuse shall inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay. Littelfuse shall honor the request if the following conditions have been met:

- a. the consent by the Data Subject or the performance of an agreement to which the Data Subject is a party as mentioned in clause 2 forms the basis for Processing the respective Personal Data and Special Personal Data;
- b. the Processing of Personal Data and Special Personal Data by Littelfuse is computerized; and
- c. the right of the Data Subject to transfer the data does not affect the rights and liberties of others.

Rejection of request

Littelfuse may reject any request and/or objection by a Data Subject mentioned in this Clause 5, if:

- a. the request is insufficiently specific;
- b. the identity of the Data Subject cannot be established with reasonable certainty;
- c. the data Processing is allowed in connection with a fraud and/or criminal investigation, a legal obligation, or a legal action;
- d. the request follows a previous request within an unreasonable interval or if the request constitutes a misuse of a right of the Data Subject. An interval of 6 months or less is considered as an unreasonable interval.

Littelfuse shall provide an explanation of any rejection of a request to the Data Subject.

Further information on data Processing rights

Data subjects may contact Littelfuse with regard to all issues related to the Processing of their Personal Data and Special Personal Data and to the exercise of their rights under this Privacy Policy.

Clause 6 - Retention periods and deletion of Personal Data

Littelfuse retains Personal Data and Special Personal Data solely:

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- a. to the extent and as long as necessary in connection with the purpose for which Littelfuse Processes the Personal Data;
- b. if reasonably necessary for compliance with applicable legal obligations;
- c. for the minimum legal retention period;
- d. for the purpose of disputes, including lawsuits and settlements.

At the end of the retention period, Littelfuse shall ensure that the Personal Data and Special Personal Data is destroyed or rendered irreversibly anonymous with due care and with sufficient technical and organizational measures so that the data can no longer be traced to the Data Subject. Littelfuse shall no longer Process the Personal Data and Special Personal Data at the end of the retention period or destruction deadline.

In addition, Littelfuse shall ensure that the Personal Data and Special Personal Data of the Data Subject is destroyed if:

- a. the Personal Data and Special Personal Data is no longer needed in connection with the purpose for which the Personal Data and Special Personal Data was collected;
- b. the Data Subject withdraws consent for Processing and there is no other legal ground for Processing as mentioned in clause 2;
- c. the permitted retention period has expired and there is no other legal ground for Processing as mentioned in clause 2;
- d. the Processing does not comply with the applicable legislation and regulations.

Clause 7 - Security

Data protection by design

When deciding how to Process Personal Data and when Processing it, Littelfuse shall implement technical and organizational measures (e.g. pseudonymizing) designed to adhere to data-protection principles (e.g. data minimization) and to integrate necessary safeguards into the Processing to meet the requirements of applicable privacy law. The measures must be appropriate considering (i) the state of the art (ii) the cost of implementation (iii) the nature, scope, context, and purposes of the Processing and (iv) the risk posed to Data Subjects.

Data protection by default

Littelfuse shall put in place appropriate technical and organizational measures for ensuring that, by default, Personal Data is not Processed unnecessarily. This applies to the amount of Personal Data collected, the extent to which it is Processed, how long it is stored and who can access it. In particular, Littelfuse must ensure that Personal Data is not made available to an indefinite number of people.

Security of Personal Data and Special Personal Data

Littelfuse shall implement appropriate technical and organizational measures to protect Personal Data and Special Personal Data against unauthorized or unlawful Processing (including unauthorized disclosure, access, loss, alteration, damage, and destruction).

Access to Personal Data and Special Personal Data - Identity Access Management

Littelfuse shall ensure that only authorized personnel has access to the Personal Data and Special Personal Data necessary for carrying out their duties. Personnel with access to Personal Data and Special Personal Data is bound to maintain the confidentiality and security of the Personal Data and Special Personal Data, and to Process it only on the instruction of Littelfuse or to comply with a requirement of law.

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Personal Data Breach / security breach

Littelfuse shall comply with any applicable privacy law requirement to notify Data Subjects or Supervisory Authorities of a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to Personal Data. Littelfuse must notify the breach in accordance with the its data breach reporting procedures.

Clause 8 - Transferring Personal Data to third parties

In the cases in which Littelfuse transfers Personal Data to third parties, Littelfuse shall do so only in accordance with applicable privacy laws and regulations and only if it has a lawful basis for doing so.

Littelfuse may transfer and store Personal Data outside the EU/EEA area in jurisdictions that do not have laws that provide sufficient protection for Personal Data.

Where Littelfuse Processes Personal Data within the EU/EEA, transfer of the Personal Data outside the EU/EEA shall only take place:

- if the recipient is in a country (or a specified sector within a country – e.g. an organization under the EU-U.S. Privacy Shield) that the European Commission recognizes as ensuring an adequate level of protection for Personal Data.
- under standard data protection clauses adopted by the European Commission or other safeguards meeting the requirements of the European General Data Protection Regulation for transfers of Personal Data outside the EEA.
- any other lawful ground for the transfer of the Personal Data.

Clause 9 - Data Protection Impact Assessments ('DPIA')

In the event of proposed Processing Personal Data, Littelfuse shall assess via a data protection impact assessment (DPIA) the impact of its proposed Processing on the protection of Personal Data and Special Personal Data before carrying out any of the following:

- a) systematic and extensive evaluation relating to Data Subjects based on automated Processing (including Profiling) which produces legal effects for the Data Subjects or similarly significantly affects them;
- b) large scale Processing or special categories of Personal Data or Personal Data relating to criminal convictions or offences;
- c) large scale, systematic monitoring of a publicly accessible area; or
- d) other Processing of Personal Data that is likely to result in a high risk to the rights and freedoms of people, particularly where new technologies are used having regard to its nature, scope, context, and purpose.

The DPIA shall be approved at local level by the applicable Littelfuse legal entity where the Processing activity takes place.

If the DPIA indicates Processing would result in a high risk to Data Subjects in the absence of mitigating measures initiated by Littelfuse, Littelfuse shall consult the Privacy Point of Contact regarding appropriate consultation with the relevant Supervisory Authority.

Clause 10 - Record keeping

When Processing Personal Data, Littelfuse shall maintain records of its Processing operations documenting the following:

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- name and contact details of the Controller;
- the purposes for which the relevant Personal Data is being Processed;
- the categories of Data Subjects whose Personal Data is being Processed and the categories of Personal Data being Processed;
- the categories of recipients to whom the Personal Data has or will be disclosed;
- transfers of Personal Data to non-EU/EEA countries (naming the relevant non-EU/EEA country);
- where possible, the time limits for retaining different categories of Personal Data;
- where possible, a general description of the technical and organizational security measures.

Littelfuse must be able to make the record available to a relevant Supervisory Authority to the extent required by applicable privacy law.

Clause 11 - Privacy management

The development and application of this Privacy Policy of Littelfuse forms an integral part of the responsibility of the Management Board of Littelfuse. At local level, in the legal entities and Branch Offices, the local Managing Director/Management is responsible for the application of this Privacy Policy.

Littelfuse appoints a Privacy Point of Contact with responsibilities in relation to data protection compliance.

Clause 12 - Queries and Complaints Procedure

Complaints procedure

Data subjects can raise a query or submit a complaint about compliance with this Privacy Policy and compliance with legislation and regulations by sending their complaint or query to Littelfuse via dataprivacy@littelfuse.com.

REVISION HISTORY

This Policy replaces the prior Littelfuse, Inc. Privacy Policy, dated July 23, 2018.

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APPENDIX A

Balancing Test Legitimate Interests

Step 1: Assess which legal ground may potentially apply under Section 6.1 (a)-(f) General Data Protection Regulation (GDPR)

Data Processing can be implemented only if one or more of the six grounds - (a) through (f) - of Section 1 of Article 6 GDPR apply (different grounds can be relied on at different stages of the same Processing activity). If it appears that Subsection 6.1 (f) might be appropriate as a legal ground, proceed to step 2.

Quick tips:

- Subsection 6.1 (a) applies only if free, informed, specific, and unambiguous consent can be given;
- Subsection 6.1 (b) covers Processing that is necessary for the implementation of the contract; just because the data Processing is related to the contract, or foreseen somewhere in the terms and conditions of the contract does not necessarily mean that this ground applies; where appropriate, consider Subsection 6.1. (f) as an alternative;
- Subsection 6.1 (c) addresses only clear and specific legal obligations under the laws of the EU or a Member State; in case of non-binding guidelines (for instance by regulatory agencies), or a foreign legal obligation, consider Subsection 6.1 (f) as an alternative.

Step 2: Qualify an interest as 'legitimate' or 'illegitimate'

To be considered as legitimate, an interest must cumulatively fulfil the following conditions:

- be lawful (i.e. in accordance with EU and national law);
- be sufficiently articulated to allow the balancing test to be carried out against the interests and fundamental rights of the Data Subject (i.e. sufficiently concrete);
- represent a real and present interest (i.e. not speculative).

Step 3: Determine whether the Processing is necessary to achieve the interest pursued

To meet this requirement, consider whether there are other less invasive means to reach the identified purpose of the Processing and serve the legitimate interest of the data Controller.

Step 4: Establish a provisional balance by assessing whether the data Controller's interest is overridden by the fundamental rights or interests of the data subjects

- Consider the nature of the interests of the Controller (fundamental right, other type of interest, public interest);
- Evaluate the possible prejudice suffered by the Controller, by third parties, or the broader community if the data Processing does not take place;
- Take into account the nature of the data (sensitive in a strict or broader sense?);
- Consider the status of the Data Subject (minor, employee, etc.) and of the Controller (e.g. whether a business organization is in a dominant market position);
- Take into account the way data is Processed (large scale, data mining, Profiling, disclosure to a large number of people or publication);

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- Identify the fundamental rights and/or interests of the Data Subject that could be impacted;
- Consider Data Subjects' reasonable expectations;
- Evaluate impacts on data subjects and compare with the benefit expected from the Processing by the data Controller.

Quick tip: Consider the effect of actual Processing on particular individuals – do not see this as an abstract or hypothetical exercise.

Step 5: Establish a final balance by taking into account additional safeguards

Identify and implement appropriate additional safeguards resulting from the duty of care and diligence such as:

- Data minimization (e.g. strict limitations on the collection of data, or immediate deletion of data after use);
- Technical and organizational measures to ensure that the data cannot be used to take decisions or other actions with respect to individuals ('functional separation');
- Wide use of anonymization techniques, aggregation of data, privacy-enhancing technologies, privacy by design, and privacy and data protection impact assessments;
- Increased transparency, general and unconditional right to object (opt-out), data portability, and related measures to empower Data Subjects.

Quick tip: Using privacy enhancing technologies and approaches can tip the balance in favor of the data Controller and protect individuals too.

Step 6: Demonstrate compliance and ensure transparency

- Draw a blueprint of steps 1 to 5 to justify the Processing before its launch.
- Inform Data Subjects of the reasons for believing the balance tips in the Controller's favor.
- Keep documentation available for data protection authorities.

Quick tip: This step is *scalable*: details of assessment and documentation should be adapted to the nature and context of the Processing. These measures will be more extensive where a large amount of information about many people is being Processed, in a way that could have a significant impact on them. A comprehensive privacy and data protection impact assessment (under Article 35 of the GDPR) will only be necessary when a Processing operation presents specific risks to the rights and freedoms of Data Subjects. In these cases, the assessment under Section 6.1 (f) could become a key part of this broader impact assessment.