**Safe Harbor Privacy Policy**  
**Effective July 22, 2013**

**Introduction**

This Safe Harbor Privacy Policy (“Policy”) sets forth the privacy principles to which Broadcom adheres concerning the transfer of personal information from the European Union (“EU”) to the United States (“US”). The US Department of Commerce and the European Commission have agreed on a set of privacy principles and frequently asked questions to enable US companies to satisfy EU legal requirements that adequate protection be given to personal information transferred from the EU to the US. As part of Broadcom’s commitment to protecting Employees’ privacy, it adheres to the principles set forth in the US-EU Safe Harbor Framework (“Safe Harbor Principles”).

**Definitions**

For the purposes of this Policy, the following definitions apply:

“Agent” means any third party that processes, collects, or uses personal information under the instructions of, and solely for, Broadcom, or to which Broadcom discloses personal information for use on our behalf.

“Broadcom” means Broadcom Corporation, its successors, subsidiaries, divisions, and groups in any state or territory of the United States.

“Employee” means an individual employed by a Broadcom affiliate located in the EU.

“Personal information” means any human resources information that identifies, or could be used by or on behalf of Broadcom to identify, an Employee, contractor, former or prospective Employee, or the relatives or dependent(s) of an Employee located in the EU, and identified or identifiable from personal information about any Employee, contractor, or former or prospective Employee.

“Sensitive personal information” means personal information that reveals race, ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that concerns health, sex life, or criminal convictions or allegations.

**Safe Harbor Principles**

The following privacy principles are based on the Safe Harbor Principles.

**Notice**

Where Broadcom collects personal information directly from Employees, it shall inform them about the purposes for which it collects and use their personal information; the types of non-Agent third parties to which Broadcom discloses that information; and the choices and means, if any, Broadcom offers Employees for limiting the use and disclosure of their personal
information. Notice will be provided in clear and conspicuous language at the time of collection, or as soon as practicable thereafter, and in any event before Broadcom uses the information for a purpose other than that for which it was originally collected.

**Choice**

Opt-outs: Where Broadcom collects personal information directly from Employees, it will offer Employees the opportunity to choose whether their personal information may be (a) disclosed to a non-Agent third party or (b) used for a purpose other than that for which it was originally collected or subsequently authorized by the Employee. Broadcom will provide Employees with reasonable mechanisms with which to exercise their choices.

Opt-ins: Where Broadcom collects sensitive personal information directly from Employees, it will offer Employees the opportunity to affirmatively and explicitly consent to the disclosure of such information to a non-Agent or the use of such information for a purpose other than that for which it was originally collected or subsequently authorized by the Employee.

**Onward Transfers**

Broadcom will obtain appropriate assurances from Agents that they will safeguard personal information consistent with Broadcom’s policies. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Safe Harbor Principles, an acknowledgement that the Agent is subject to EU Directive 95/46/EC (“EU Data Protection Directive”), a Safe Harbor certification by the Agent, and/or an acknowledgement that the Agent is subject to another European Commission adequacy finding. Where Broadcom has knowledge that an Agent is using or transferring personal information in a manner contrary to Broadcom policy, Broadcom will take reasonable steps to prevent or stop the use or disclosure.

**Data Security**

Broadcom will take reasonable precautions designed to protect personal information in its possession from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Although Broadcom takes such precautions, it cannot guarantee that personal information will always remain secure.

**Data Integrity**

Broadcom will use personal information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the Employee. Broadcom will take reasonable steps to ensure that personal information is relevant to its intended use, accurate, complete, and current.

**Access**

Upon request, Broadcom will grant Employees reasonable access to personal information that it holds about them. In addition, Broadcom will take reasonable steps to permit Employees to correct, amend or delete information that is demonstrated to be inaccurate or incorrect. In some instances, access may be denied where the burden or expense of providing access would be disproportionate to the risks to the Employee’s privacy in the case in question or where the rights of persons other than the Employees would be violated.
Enforcement and Dispute Resolution

Broadcom will conduct compliance audits of its relevant privacy practices to verify adherence to this policy. Any Employee who Broadcom determines to be in violation of this policy will be subject to disciplinary action which may include termination of employment. Any questions or concerns regarding the transfer of personal information from the European Economic Area (EEA) or Switzerland should be directed to the email below. Complaints or concerns that cannot be resolved internally will be referred to the TRUSTe EU Safe Harbor Program.

Limitation on Scope of Principles

Adherence by Broadcom to this policy may be limited to the extent required to meet legal, governmental or national security obligations.

Changes to This Policy

This policy may be amended from time to time consistent with the requirements of the Safe Harbor Principles. Broadcom will provide appropriate notice about such amendments.

Contact Information

If you have questions or comments about this Safe Harbor Privacy Policy, please contact Broadcom’s Global Privacy Officer at 5300 California Ave, Irvine, CA 92617 or privacy-list@broadcom.com.