

# C1.20 Data Protection and Privacy Policy; Safe Harbor Framework

	<b>Policy Statement</b> <b>Parker Hannifin Corporation</b>
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Effective Date	Supersedes	This Sheet	Total Sheets	Policy Number
7-22-09	3-1-05	1	3	1-20
<b>Subject: POLICY ON DATA PROTECTION AND PRIVACY OF PERSONAL INFORMATION</b>				

Parker-Hannifin Corporation collects and uses certain personal information in connection with the management and administration of pre-employment, employment and post-employment relationships, as well as certain information regarding customers, suppliers, business partners and other third parties. Due to the global nature of Parker's business, such activities include the transfer of such personal information from one legal entity to another legal entity within Parker's corporate structure and across national boundaries. Parker is dedicated to compliance with all laws and regulations relating to the collection, use and transfer of personal information concerning potential, current and past employees and their family members, particularly European Union Directive 95/46/EC on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Movement of Such Data ("the EU Directive" or "the EU Directive on Data Privacy"), Switzerland's Federal Act on Data Protection ("the FADP"), and the corresponding Safe Harbor Principles established by the U.S. Department of Commerce (the "Safe Harbor Principles") applicable to personal information transferred from EU member nations and Switzerland to U.S. recipients.

## 1.0 PURPOSE

This policy's purpose is to inform employees and others of the principles under which Parker processes personal information received from Switzerland and countries belonging to the EU. This policy complies with the U.S. Department of Commerce Safe Harbor Privacy Policies and the 15 FAQ's that make up the Safe Harbor Framework.

## 2.0 SCOPE

This policy applies to all personal data, whether from employees or others, received by Parker-Hannifin in the United States from Switzerland and the European Union ("EU"), in any format, including without limitation electronically.

## 3.0 POLICY

### DEFINITIONS

"Personal data" and "personal information" are data about an identified or identifiable individual, received by Parker in the U.S. from the EU, and recorded in any form.

A "data subject" is the individual who is the subject of personal data or information.

"Processing" means any online and offline processing and includes such activities as copying, filing, and inputting personal information into a database.

"Sensitive data" is data that pertains to racial or ethnic origins, political or religious beliefs, or health or sex life. Sensitive data may not be processed at all, unless the individual has given explicit consent.

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In processing personal data, Parker complies with the following Safe Harbor Principles. Adherence to the principles may be limited in certain cases to the extent necessary to meet national security, public interest, or law enforcement requirements.

**4.0 PROCEDURE**

**SAFE HARBOR PRINCIPLES**

**Notice**

Parker notifies all identified data subjects about the purposes for which personal information is collected and used. In certain situations, data is "anonymized" so that the names of the data subjects are not known by data processors within Parker. In these cases, data subjects do not need to be notified.

**Choice**

Parker gives each data subject the opportunity to opt out from allowing the Company to disclose his/her personal information to a third party or to use it for a purpose incompatible with the purpose for which it was originally collected or authorized. For sensitive data, affirmative choice (opt-in) must be given if the data is to be disclosed to a third party or used for a purpose other than its original purpose or the purpose authorized.

**Onward Transfer (to Third Parties)**

Parker may transfer information to a third party acting as an agent for Parker, such as an outside benefits administrator, by making sure that the third party enters into an agreement with Parker in which the third party promises to provide the same level of protection as required by the Safe Harbor Principles.

**Security**

Parker takes reasonable precautions to protect personal data from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. These precautions include password protections for online information systems and restricted access to personal data processed by the Human Resources Department.

**Data Integrity**

Parker takes reasonable steps to ensure that personal data is accurate, complete, and current. All employees are asked to inform the Human Resources and Payroll Departments immediately in the event of changes in personal information.

**Access**

Upon request, data subjects may get reasonable access to personal information about them and are able to have inaccurate information corrected.

**Enforcement**

Parker self-certifies annually with the U.S. Department of Commerce as a data controller, and the U.S. Federal Trade Commission has been empowered to investigate complaints and to obtain redress for

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individuals in case of the Company's noncompliance with the Safe Harbor Principles. All Parker supervisors are responsible for enforcing this policy. Parker Employees are expected to be familiar with and comply with all such statements of policy in this area. Failure to comply may result in disciplinary action up to and including termination.

**Verification**

Parker conducts an annual self-assessment in order to verify that this Policy on Data Protection and Privacy of Personal Information is published and implemented within the Company and that it conforms to the Safe Harbor Principles.

**Dispute Resolution**

Any questions or concerns regarding the use or disclosure of personal information should be directed to the Parker-Hannifin Privacy Office at the address given below. Alternatively, an employee can contact the local EU Union or Swiss Data Protection Authorities directly. Parker will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information in accordance with the principles contained in this policy. For complaints that cannot be resolved between Parker and the complainant, Parker agrees to cooperate with the European Union and Swiss Data Protection Authorities in the event the complainant is an employee. Furthermore, Parker submits to the final and binding jurisdiction of the Federal Trade Commission.

**Contact Information**

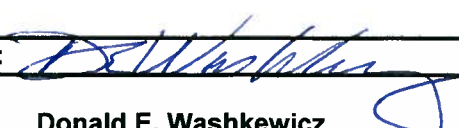

Questions or comments regarding this policy should be submitted to the Parker Privacy Office:

By Email:  
[PrivacyOffice@parker.com](mailto:PrivacyOffice@parker.com)

By Mail:  
 Parker-Hannifin Privacy Office  
 Attn: HRIS Manager  
 6035 Parkland Boulevard  
 Cleveland, Ohio 44124-4141

**Changes to this Safe Harbor Privacy Policy**

This policy may be amended from time to time, consistent with the requirements of the Safe Harbor Principles. Appropriate notice will be given concerning such amendments. This policy shall be posted to Parker's external website, [www.parker.com](http://www.parker.com) and to Parker's employee intranet, [pol.parker.com](http://pol.parker.com).

Approved:  <div style="text-align: center;"><b>Donald E. Washkewicz</b></div>	Approved:  <div style="text-align: center;"><b>Daniel S. Serbin</b></div>
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