

Compliance with the Privacy Shield Framework

We comply with the Privacy Shield Framework, as set forth by the U.S. Department of Commerce in consultation with the European Commission, regarding the collection, use and retention of Personal Information received from the European Union. As we are a U.S. company, we have voluntarily decided to comply with the EU – U.S. Privacy Shield Framework and we are subject to the investigatory and enforcement powers of the Federal Trade Commission. We annually certify our adherence to the Privacy Shield Principles of notice; choice; accountability for onward transfer; security; data integrity and purpose limitation; access; and recourse, enforcement and liability. To learn more about the EU – U.S. Privacy Shield Framework, please visit <https://www.privacyshield.gov/EU-US-Framework>. To view Arrow’s certification, please visit <https://www.privacyshield.gov/list>.

When we engage third-party service providers and when disclosure of Personal Information to such providers is necessary for the provision of such service, we ensure that such providers protect Personal Information in a manner consistent with this Privacy Policy and, where applicable, are responsible for ensuring that such third parties process EU Personal Information in a manner consistent with the Privacy Shield Principles discussed above.

EU persons may request access to their Personal Information under this policy to the full extent required by applicable law in the home country of the person making the request. Such persons may request the correction, amendment, or deletion of their Personal Information that is inaccurate or has been processed in violation of the Privacy Shield Principles. We will reasonably fulfill such requests to the extent required by applicable law.

Any EU person who is not satisfied with our compliance with the EU – U.S. Privacy Shield may contact us to resolve such complaints at compliance@arrow.com or by sending a letter to the addresses set forth below. If any EU person believes that such a complaint has not been resolved, he or she agrees first to try and settle the dispute by mediation, administered by the International Centre for Dispute Resolution under its Mediation Rules, before resorting to arbitration, litigation, or some other dispute resolution procedure. The rules governing these procedures and information regarding how to file a claim free of charge can be found here: <http://info.adr.org/safeharbor/>.

Any EU person who remains dissatisfied may contact his or her national Data Protection Authority in the country where the person resides. We have agreed to cooperate and comply with appropriate EU Data Protection Authorities and the Department of Commerce in resolving such disputes. If an EU person remains dissatisfied and meets the pre-arbitration requirements of Annex I Part C of the EU – U.S. Privacy Shield Framework, the person may invoke binding arbitration pursuant to procedures in Annex I of the EU – U.S. Privacy Shield Framework Principles found here: <https://www.privacyshield.gov/EU-US-Framework>.

For any requests relating to your Personal Information, or if you have any questions about this Privacy Policy, please contact us at:

9201 East Dry Creek Road

Centennial, CO 80112

(Attention: Legal Counsel)

European users can contact us at:

Frankfurter Straße 211

63263 Neu-Isenburg

Germany

(Attention: Legal Counsel)