

Motorola Solutions Binding Privacy Rules

Introduction

These Binding Privacy Rules (“**Rules**”) explain how the Motorola Solutions group (“**Motorola Solutions**”) respects the privacy rights of its customers, employees, suppliers and other individuals whose personal information Motorola Solutions collects and uses.

All companies within the Motorola Solutions group of companies (“**Group Members**”) and their employees must comply with these Rules when collecting or using any personal information. Group Members transfer personal information to other Group Members on a global basis as part of Motorola Solutions’ regular business activities and the Rules will apply when such transfers take place. The Rules will also apply when one Group Member is processing personal information on behalf of other Group Member.

The Rules seek to ensure that personal information will be treated in a consistent, secure manner and with full respect for privacy rights and freedoms, no matter where it comes from or how Motorola Solutions uses it.

Motorola Solutions’ management is fully committed to ensuring that Group Members and Motorola Solutions employees and contractors comply with these Rules at all times. Motorola Solutions employees and contractors who do not comply with their responsibilities under these Rules may be subject to disciplinary action, up to and including termination of their employment or contract.

The Rules form part of Motorola Solutions’ comprehensive information security strategy and demonstrate Motorola Solutions’ strong commitment to protecting individuals’ privacy rights.

Scope of the Rules

These Rules apply whenever Motorola Solutions collects or uses personal information of employees, customers, suppliers and other individuals. They apply to all worldwide processing of personal information by Group Members.

The Rules apply to all electronic personal information collected by Motorola Solutions and also to certain non-electronic personal information contained in readily accessible filing systems.

Compliance with local law

Motorola Solutions must comply with, and have a legitimate basis consistent with, the requirements of applicable local laws when collecting and/or using personal information. Where there is no applicable law, or the law does not meet the standard set out in the Rules, Motorola Solutions will process personal information in accordance with the Rules.

Transparency and fairness

Motorola Solutions will use appropriate means to explain to individuals in a clear and comprehensive way how their personal information will be used at the time when it collects their personal information or, if not practicable to do so at the point of collection, as soon as possible thereafter, unless there is a legitimate basis for not doing so (for example, where it is necessary to safeguard national security or defence, for the prevention or detection of crime, taxation purposes, legal proceedings or where otherwise permitted by law).

The information Motorola Solutions will provide to individuals will include the purpose of the processing, the identity of the Group Member that is the data controller of the personal information, the rights of the individuals under these Rules, and any other information necessary to ensure that Motorola Solutions' use of personal information is fair (such as the identity of any recipients of the personal information in question).

Sensitive personal information

Unless Motorola Solutions has a legitimate basis for doing so consistent with the requirements of applicable data protection laws, Motorola Solutions will only use sensitive personal information if it is absolutely necessary to use it and where the individual's express consent has been obtained.

Sensitive personal information for the purposes of the Rules includes information relating to an individual's racial or ethnic origin, political opinions, religious or other beliefs, trade union membership, health, sex life and criminal convictions. In some jurisdictions there may be national laws which require express consent for the use of other categories of information, such as financial information, social security numbers and biometric identifiers. If this is the case Motorola Solutions will only use such information in accordance with the applicable local law.

Data Transfers outside Europe

Due to the global nature of Motorola Solutions' business, Group Members may transfer personal information to Motorola Solutions' ultimate parent company, Motorola Solutions, Inc. located in the United States, and to other Group Members in other countries globally

that may not provide a level of protection equivalent to the laws provided in Europe¹. However, Motorola Solutions must ensure that, even where this is the case, the personal information of employees, customers, suppliers and other individuals whose personal information is collected and used by Motorola Solutions will only ever be treated in accordance with these Rules.

Purpose limitation

Motorola Solutions shall collect and use personal information only for the specific and legitimate purposes notified to individuals or within their reasonable expectations. Motorola Solutions shall not process the personal information in a way incompatible with those purposes unless the individuals are made aware of such change or it is within their expectations and they can express their concerns. In some cases the individual's consent to the new uses or disclosures will be necessary.

Motorola Solutions may have a legitimate basis for processing the information for a different or new purpose, for example, where it is necessary to safeguard national security or defence, for the prevention or detection of crime, taxation purposes, legal proceedings or where otherwise required to protect individuals or the rights and freedoms of others.

In particular, a Group Member may only process personal information (including sensitive personal information) collected in Europe for a different or new purpose if that Group Member has a legitimate basis for doing so consistent with the applicable law of the European country in which the personal information was collected.

Data quality and proportionality

Motorola Solutions will ensure that personal information collected and used is:

- accurate and, where necessary, kept up-to-date;
- adequate, relevant and not excessive in relation to the purposes for which it is collected and used;
- not processed for longer than necessary for the purposes for which it is obtained and further processed; and
- retained in accordance with Motorola Solutions' Records Management Policy and relevant schedules, as amended from time to time.

¹ Europe means the European Economic Area
Motorola Solutions Internal

Transfers to third parties

Motorola Solutions will not transfer personal information to third party data controllers or data processors outside Motorola Solutions without ensuring adequate protection for the information. For personal information initially subject to EU law this might be achieved by the use of contractual clauses, such as the EU Standard Contractual Clauses when the personal information is transferred to third party data controllers or data processors outside of the European Economic Area.

Publication of the Rules

Motorola Solutions will make a copy of the Rules available via a publicly-accessible website at www.motorolasolutions.com.

Rights of access, rectification, erasure and blocking of personal information collected, used and transferred from Europe

Individuals whose personal information is collected and/or used in Europe and transferred between Group Members under the Rules have the right to obtain the information which relates to them and which is being processed by Motorola Solutions.

Motorola Solutions will deal with such requests as follows;

- where a request is made by individuals to a Group Member located in Europe in respect of personal information which has been collected and/or used in Europe and/or transferred from Europe to another Group Member under the Rules the Group Member will deal with the request in accordance with applicable local law;
- where a request is made by an individual to a Group Member located outside Europe for personal information which has been collected and/or used in Europe and transferred to the Group Member under the Rules the Group Member will provide the information requested unless:
 - in the opinion of the Group Member it is necessary not to do so to safeguard the legitimate business interests of Motorola Solutions, national or public security, defence, the prevention, investigation, detection and prosecution of criminal offences, for the protection of the data subject or of the rights and freedoms of others; or
 - the personal information is held by Motorola Solutions in non-electronic form and is not or will not become part of a filing system.

Motorola Solutions employees may request the rectification of their personal information and/or object to the processing of their personal information by contacting their managers

or HR representatives in writing or verbally. Their managers and HR representatives will, in consultation with regional privacy personnel and, where necessary, the Privacy & Data Security Compliance Committee, make any necessary decision regarding such requests.

Motorola Solutions customers and suppliers may request the rectification of their personal information and/or object to the processing of their personal information by contacting Motorola Solutions at privacy1@motorolasolutions.com. The Group Member with custody over the information requested will make any decisions in relation to such requests in consultation with regional privacy personnel. Where necessary, Group Members will also seek the advice of Motorola Solutions' Privacy & Data Security Compliance Committee.

The right to object to receiving marketing information

Individuals may opt out of personal data processing for purposes of direct marketing by Motorola Solutions on request and free of charge by contacting Motorola Solutions at privacy1@motorolasolutions.com.

Automated individual decisions

Motorola Solutions will ensure that where any evaluation of or decision about individuals which significantly affects them is based solely on automated processing of personal information, those individuals will have the right to know the logic involved in the decision and appropriate measures will be taken to safeguard their legitimate interests.

Security and Confidentiality of Data

Motorola Solutions is committed to protecting the confidentiality, security and integrity of personal information.

To this end, Motorola Solutions will implement appropriate technical and organisational measures to protect personal information against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where processing involves transmission of personal information over a network, and against all other unlawful forms of processing. In particular, Motorola Solutions will deploy enhanced security measures whenever processing any sensitive personal information. Motorola Solutions will also ensure that their employees and contractors at all times adhere to Motorola Solutions' specific information security policies in place from time to time.

Motorola Solutions has strict rules which must be complied with when using a service provider and which should be referred to when a service provider is engaged. These rules provide that Motorola Solutions will ensure that providers of services to Motorola Solutions will also adopt appropriate security measures and will enter into contractual arrangements with Motorola Solutions which provide that:

- the service provider will only act on the instructions of Motorola Solutions; and
- the service provider has in place appropriate technical and organisational security measures to safeguard the personal information.

Where one Group Member processes personal information on behalf of another Group Member, that Group Member will adhere to the Motorola Solutions security policies in place from time to time in respect of that processing and act only on the instructions of the Group Member on whose behalf the processing is carried out.

Training Programme

Motorola Solutions will provide appropriate training on the Rules and related policies to all individuals who:

- have permanent or regular access to personal information including sensitive personal information;
- are involved in the collection of personal information; or
- are involved in the development of tools used to process personal information.

Audit Programme

Motorola Solutions will conduct regular audits of compliance with the Rules ("**Privacy Audits**").

Privacy Audits shall have as their scope the auditing of compliance with all aspects of the Rules and will include methods of ensuring that corrective actions take place.

The Motorola Solutions Privacy & Data Security Compliance Committee shall conduct periodic Privacy Audits. The Privacy and Data Security Committee may also conduct an unscheduled Privacy Audit more frequently in response to a specific request from a Group Member, regional privacy personnel, IS, or Motorola Solutions' management.

In addition, as part of its standards of internal control, the Motorola Solutions Audit Services department will undertake independent assessments on risk management, controls, and governance processes. Compliance with the BCR will be assessed by Audit Services using a risk-based approach.

Audit findings will be reported to the appropriate regional privacy personnel and the Privacy & Data Security Compliance Committee. Any material audit findings will be reported to the Board of Motorola Solutions.

Motorola Solutions will provide upon request copies of the results of any audit of the Rules to a European data protection authority of competent jurisdiction subject to applicable law and respect for the confidentiality and trade secrets of the information provided.

Where any Group Member is located within the jurisdiction of a data protection authority based in Europe, Motorola Solutions agrees that that data protection authority may audit that Group Member for the purpose of reviewing compliance with the Rules, in accordance with the applicable law of the country in which the Group Member is located, or, in the case of a Group Member located outside Europe, in accordance with the applicable law of the European country from which the personal information is transferred under the Rules, on giving reasonable prior notice and during business hours (unless this requirement is in conflict with local law), with full respect to the confidentiality of the information obtained and to the trade secrets of Motorola Solutions.

Compliance and supervision of compliance

As part of its commitment to ensuring compliance with the Rules and to respecting individuals' rights to privacy, Motorola Solutions has a Privacy & Data Security Compliance Committee and a network of regional privacy personnel, who take responsibility for privacy-related matters across the various functional groups (HR, IS, Legal, Marketing and country management). The functional representatives consult and coordinate with one another as required. They report to the Privacy and Data Security Committee which, in turn, reports to the Corporate Vice President, Human Resources, Employment Law and Data Protection and the Privacy Committee Chair. At the individual country level, Motorola Solutions has appointed country managers who are responsible for compliance with national laws, including privacy, with support from the regional privacy personnel and the Privacy & Data Security Compliance Committee. Country managers report to senior management, so privacy will be reported, along with other compliance roles, within the Motorola Solutions' governance tracking system.

Motorola Solutions' Privacy and Data Security Compliance Committee and regional privacy personnel must ensure that Motorola Solutions is in compliance with the Rules, as well as all applicable national and international legal and regulatory privacy requirements that relate to data privacy. In addition, the Privacy and Data Security Committee and regional privacy personnel are responsible for the following:

- working with business units, the Chief Administrative Office (CAO) and other core functions for the development and maintenance of policies and standards relating to data protection;
- working with the Law Department to stay current on all national and international legal and regulatory requirements that affect Motorola Solutions;

- providing data protection advice to the business units on a day-to-day and project basis; and
- assisting with Data Protection Authorities' requests for information or cooperation and managing local requests for information held about them by individuals and complaints.

Internal Complaint Mechanisms

Any individual whose personal information is subject to these Rules may raise any privacy-related compliance issues or concern that Motorola Solutions is not complying with the Rules or applicable data protection law by contacting privacy1@motorolasolutions.com where details of Motorola Solutions' complaint handling policy may be obtained.

Third party beneficiary rights for European Data Subjects and Liability

European data protection law states that the employees, contractors, clients and other individuals whose personal information is used and/or collected by a Group Member in Europe and transferred to a Group Member outside Europe must benefit from certain rights. In particular, individuals may seek enforcement of the Rules and, where appropriate, compensation for breaches of the Rules through any or all of the following means:

- *Complaints:* Individuals may make complaints to the Group Member in Europe that used, collected and/or transferred their personal information and/or to a European data protection authority of competent jurisdiction;
- *Proceedings:* Individuals may bring proceedings against Motorola Solutions UK Ltd. either in the courts of England and Wales (being the jurisdiction of Motorola Solutions UK Ltd.) or the jurisdiction of the Group Member located in Europe from which the personal information was transferred; and/or
- *Liability:* Individuals may seek appropriate redress from Motorola Solutions UK Ltd including the remedy of any breach of the Rules by any Group Member outside Europe and, where appropriate receive compensation from Motorola Solutions UK Ltd for any damage suffered as a result of a breach of the Rules by a Group Member in accordance with the determination of the court or other competent authority.

In the event of a claim being made in which an individual has suffered damage where that individual can demonstrate that it is likely that the damage has occurred because of a breach of the Rules, the burden of proof to show that a Group Member outside Europe is not responsible for the breach, or that no such breach took place, will rest with Motorola Solutions UK Ltd.

Individuals may obtain a copy of the Rules and the intra-group agreement entered into by Motorola Solutions in connection with the Rules.

Mutual assistance and cooperation with Data Protection Authorities

Each Group Member shall cooperate and assist other Group Members as necessary to handle a request or complaint from an individual or an investigation or inquiry by a data protection authority with competent jurisdiction.

Motorola Solutions will actively review and consider the advice of the data protection authorities of competent jurisdiction on any issues regarding the interpretation of the Rules and will abide by a formal decision of the applicable data protection authority which is final and against which no further appeal is possible on any issue related to the interpretation and application of these Rules.

Relationship between national laws and the Rules

Where a Group Member has reason to believe that local legislation is likely to have a substantial adverse effect on its ability to fulfil its obligations under the Rules, the Group Member should promptly inform The Privacy & Data Security Compliance Committee at <mailto:privacy1@motorolasolutions.com> (except where prohibited by a law enforcement authority, such as a prohibition under criminal law to preserve the confidentiality of a law enforcement investigation). The Privacy & Data Security Compliance Committee will determine a suitable course of action aimed at ensuring compliance with the BCR in consultation with the relevant data protection supervisory authority if necessary.

Effective date of the Rules and the procedure for updating the Rules

Motorola Solutions will communicate any material changes to the Rules to the Information Commissioner's Office and any other relevant European data protection authorities at least once a year. However, Motorola Solutions does not expect to have to communicate changes to the Rules which are administrative in nature or which have occurred as a result of a change of applicable data protection law in any European country, through any legislative, court or supervisory authority measure unless they result in a substantive change to the Rules. Motorola Solutions will also provide a brief explanation of the reasons for any notified changes to the Rules.

Motorola Solutions will communicate any changes to the Rules to the Group Members bound by the Rules and to the individuals who benefit from the Rules.

Motorola Solutions UK Ltd will maintain an up to date list of the Group Members and ensure that all new Group Members are bound by the Rules before a transfer of personal information to them takes place. Motorola Solutions will communicate any substantial changes to the list of Group Members on an annual basis. Otherwise, an up-to-date list of

Group Members will be provided to the Information Commissioner's Office and any other relevant European data protection authorities where required.

The Rules became effective on May 2, 2013. The Rules apply to all personal information processed by Motorola Solutions or its service providers on or after that date and the Rules will take precedence over any other policies or procedures within Motorola Solutions relating to the collection and use of personal information.