

Data Privacy Principle

Principle Statement:

3M is committed to complying with all applicable privacy and data protection laws, wherever it does business. 3M respects its employees' privacy. Any personal information 3M collects, regarding employees or any third party, will be treated with care, protected, and used lawfully and properly.

Purpose:

This Principle helps ensure that 3M complies with all privacy and data protection laws globally. This commitment reflects the value 3M places on earning and keeping the trust of its employees, customers, business partners and others who share their personal information with the company.

This Principle applies globally to all employees and may apply to those acting on behalf of 3M. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.

Additional Guidance:

- Data privacy laws vary by country and can be complex. Employees must consult their business unit's assigned legal counsel whenever they are not sure of the legal requirements.
- Before engaging in any of the activities listed here, employees must consult their business unit's assigned legal counsel and 3M's data privacy experts in Legal Affairs to be sure their activities are permitted by applicable law and 3M policies:
 - Collecting, using or disclosing personal information without the knowledge and consent of the individual whose data is being handled.
 - Disclosing personal information about 3M employees, customers and business partners to third parties.
 - Transferring personal information from one country to another, even among 3M affiliates.
 - Using web-based cookies, tracking software, and making data more anonymous.
- 3M adheres to the following guidelines to the extent required by applicable laws:

Limitations on the collection, use and disclosure of personal information.

- Notice – 3M will provide timely and appropriate notice to individuals about its data collection practices.
- Consent – 3M will collect, use, disclose and transfer personal information only with the individual's consent, which may be express or implied, depending on the sensitivity of the personal information, the individual's reasonable expectations and legal requirements.
- Purpose limitation – 3M will collect personal information only for specific, limited purposes. The information 3M collects will be relevant, adequate and not excessive for the purposes for which it is collected. 3M will not process personal information in a manner inconsistent with the purposes for which it was originally collected, unless the individual has subsequently consented to the new use of their personal information.
- Direct marketing - 3M will not use personal information for direct marketing purposes without giving the individual an opportunity to "opt-out."
- Transfers to third parties and other countries - 3M will take appropriate measures, by contract or otherwise, to provide adequate protection for personal information that is disclosed to a third party or transferred to another country, including transfers within 3M.

Management of personal information.

- Quality - 3M will take commercially reasonable steps to ensure that personal information is reliable for its intended use, accurate, complete, and, where necessary, kept up-to-date.
- Access - 3M will maintain procedures to give individuals reasonable access to their personal information and, when appropriate, the ability to correct or delete inaccurate or incomplete information.

- Security - 3M will take commercially reasonable measures to protect personal information from loss, misuse, unauthorized access or disclosure, alteration and destruction.
- Retention - 3M will not keep personal information for longer than necessary or permitted by law.

Accountability and enforcement.

- Accountability - 3M will designate individuals within the company to be accountable for compliance with laws and related 3M policies.
- Enforcement - 3M will provide internal controls for verifying compliance with laws and related 3M policies and procedures.
- Complaint process - 3M will provide a fair process for investigating and resolving complaints and communicate the process to the individuals.

Penalties:

Violations of the law and 3M's Code of Conduct will result in discipline, up to and including termination from employment.