

## **Northrop Grumman EU-U.S. Data Privacy Framework Privacy Notice for Non-Affiliated EU Individual Personal Data**

**Last Updated: September 27, 2023**

**Last Reviewed: September 25, 2024**

Northrop Grumman Corporation respects your concerns about privacy. Northrop Grumman Corporation and certain of its [U.S.-based affiliates](#) (“Northrop Grumman”) participates in the EU-U.S. EU-U.S. Data Privacy Framework Principles (“EU-U.S. Data Privacy Framework Principles”) framework issued by the U.S. Department of Commerce. Northrop Grumman commits to comply with the EU-U.S. Data Privacy Framework Principles with respect to EU Personal Data of a Non-affiliated EU Individual the company receives from the EU in reliance on the EU-U.S. Data Privacy Framework Principles. This Notice describes how Northrop Grumman implements the EU-U.S. Data Privacy Framework Principles for Non-affiliated EU Individual Personal Data.

For purposes of this Notice:

“Non-affiliated EU Individual” means any natural person who is located in the EU, but excludes any individual acting in his or her capacity as an Employee.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“EU Customer” means any entity that purchases or otherwise obtains products or services from Northrop Grumman.

“EU Employee” means any current, former or prospective employee or contractor of Northrop Grumman or any of its European affiliates or any related individual whose Personal Data Northrop Grumman processes in connection with an employment relationship, who is located in the EU. For purposes of this Manual, “Employee” includes any temporary worker, intern, or other non-permanent employee of the company.

“EU” means the European Union and Iceland, Liechtenstein, and Norway.

“EU Personal Data” means any information, including EU Sensitive Data that is (i) about an identified or identifiable individual, (ii) received by Northrop Grumman in the U.S. from the EU, and (iii) recorded in any form.

“EU-U.S. Data Privacy Framework Principles” means the Principles and Supplemental Principles of the EU-U.S. Data Privacy Framework Principles.

“Processor” means any natural or legal person, public authority, agency or other body that processes EU Personal Data on behalf of a Controller.

“EU Sensitive Data” means EU Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, sex life, the commission or alleged commission of any offense, any proceedings for any offense committed or alleged to have been committed by the individual or the disposal of such proceedings, or the sentence of any court in such proceedings.

Northrop Grumman’s EU-U.S. Data Privacy Framework Principles certification can be found at [www.dataprivacyframework.gov/s/participant](http://www.dataprivacyframework.gov/s/participant). For more information about the EU-U.S. Data Privacy Framework Principles, please visit [www.dataprivacyframework.gov](http://www.dataprivacyframework.gov). For more information about Northrop Grumman’s processing of Non-affiliated EU Individual Personal Data with respect to information collected on its websites, please visit Northrop Grumman’s Online Privacy Notice or other privacy notices published by the company.

### **Types of Personal Data Northrop Grumman Collects**

Northrop Grumman obtains EU Personal Data, such as contact information, in connection with maintaining its Customer relationships and providing products and services to Customers. Northrop Grumman also obtains EU Personal Data of its suppliers’ representatives, such as contact information, financial statements and reputational data. Northrop Grumman uses this information to manage its relationships with its suppliers and comply with applicable law or legal requirements.

In addition, Northrop Grumman collects EU Personal Data directly from Non-affiliated EU Individuals. This collection occurs, for example, when the individual visits Northrop Grumman’s websites and provides EU Personal Data to the company. The company may use this information to:

- provide products and services;
- send promotional materials or other communications;
- communicate with Customers about, and administer their participation in, special events, programs, offers, surveys and market research;
- respond to Customer inquiries;
- perform data analyses (including anonymization and aggregation of EU Personal Data);
- operate, evaluate and improve the company’s business (including developing new products and services; enhancing and improving the company’s products and services; managing the company’s communications; analyzing the company’s products, services and communications; and performing accounting, auditing and other internal functions);
- management of customer services including management of negotiations, contracts, transactions, and customer accounts, budgeting, accounting, maintaining records related to customers financials analysis;
- protect against, identify and prevent cybersecurity and other security events, espionage, fraud and other unlawful activity, claims and other liabilities; and

- comply with and enforce applicable legal requirements, relevant industry standards and the company's policies.

Northrop Grumman also may use the information in other ways for which the company provides specific notice at the time of collection.

The types of Personal Data Northrop Grumman collects in connection with these activities includes:

- contact information (such as name, postal address, telephone number and email address);
- login credentials for the company's websites;
- photograph, electronic signature, and acknowledgements of company policy;
- other personal information submitted by current or prospective suppliers and subcontractors, such as government issued identifiers, and civil and criminal court history; and
- bank account and financial details;
- other EU Personal Data found in content that Non-affiliated Individuals provide.

Northrop Grumman's privacy practices regarding the processing of Non-affiliated EU Individual Personal Data comply with the EU-U.S. Data Privacy Framework Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

## **Notice**

Northrop Grumman provides information in this Notice and the company's Online Privacy Notice about its Non-Affiliated EU Individual Personal Data practices, including the types of EU Personal Data Northrop Grumman collects, the types of third parties to which Northrop Grumman discloses the EU Personal Data and the purposes for doing so, the rights and choices Non-affiliated EU Individuals have for limiting the use and disclosure of their EU Personal Data, and how to contact Northrop Grumman about its practices concerning EU Personal Data. Privacy notices pertaining to specific data processing activities also may contain relevant information.

## **Choice**

Northrop Grumman generally offers Non-affiliated EU Individuals the opportunity to choose whether their EU Personal Data may be (i) disclosed to third-party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Non-affiliated EU Individual. To the extent required by the EU-U.S. Data Privacy Framework Principles, Northrop Grumman obtains opt-in consent for certain uses and disclosures of Sensitive Data. Non-affiliated EU Individuals may contact Northrop Grumman as indicated below regarding the company's use or disclosure of their EU Personal Data. Unless Northrop Grumman offers Non-affiliated EU Individuals an

appropriate choice, the company uses EU Personal Data only for purposes that are materially the same as those indicated in this Notice or the company's Online Privacy Notice.

Northrop Grumman may disclose Non-affiliated EU Individual Personal Data without offering an opportunity to opt out, and may be required to disclose the EU Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Northrop Grumman also reserves the right to transfer EU Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution, or liquidation).

### **Accountability for Onward Transfer of Personal Data**

This Notice and Northrop Grumman's Online Privacy Notice describe Northrop Grumman's sharing of Non-Affiliated EU Individual Personal Data.

Except as permitted or required by applicable law, Northrop Grumman provides Non-affiliated EU Individual with an opportunity to opt out of sharing their EU Personal Data with third-party Controllers. Northrop Grumman requires third-party Controllers to whom it discloses Non-affiliated EU Individual Personal Data to contractually agree to (i) only process the EU Personal Data for limited and specified purposes consistent with the consent provided by the relevant Non-affiliated EU Individual, (ii) provide the same level of protection for EU Personal Data as is required by the EU-U.S. Data Privacy Framework Principles, and (iii) notify Northrop Grumman and cease processing EU Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for EU Personal Data as is required by the EU-U.S. Data Privacy Framework Principles.

With respect to transfers of Non-affiliated EU Individual Personal Data to third-party Processors, Northrop Grumman (i) enters into a contract with each relevant Processor, (ii) transfers EU Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the EU Personal Data with at least the same level of privacy protection as is required by the EU-U.S. Data Privacy Framework Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the EU Personal Data in a manner consistent with Northrop Grumman's obligations under the EU-U.S. Data Privacy Framework Principles, (v) requires the Processor to notify Northrop Grumman if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the EU-U.S. Data Privacy Framework Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the EU Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request. Northrop Grumman remains liable under the EU-U.S. Data Privacy Framework Principles if the company's third-party Processor onward transfer

recipients process relevant EU Personal Data in a manner inconsistent with the EU-U.S. Data Privacy Framework Principles, unless Northrop Grumman proves that it is not responsible for the event giving rise to the damage.

Northrop Grumman is also certified that it complies with the EU-U.S. Data Privacy Framework Principles as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Click here to view our EU-U.S. and Swiss-U.S. Data Privacy Framework Principles Notices [www.dataprivacyframework.gov](http://www.dataprivacyframework.gov) and our participating U.S. subsidiaries. To learn more about the Data Privacy Framework program, and to view our certification, please visit [www.dataprivacyframework.gov/s/participant](http://www.dataprivacyframework.gov/s/participant).

## **Security**

Northrop Grumman takes reasonable and appropriate measures to protect Non-affiliated EU Individual Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the EU Personal Data

## **Data Integrity and Purpose Limitation**

Northrop Grumman limits the Non-affiliated EU Individual Personal Data it processes to that which is relevant for the purposes of the particular processing. Northrop Grumman does not process Non-affiliated EU Individual Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant Non-affiliated EU Individual. In addition, to the extent necessary for these purposes, Northrop Grumman takes reasonable steps to ensure that the EU Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Northrop Grumman relies on non-affiliated EU Individuals to update and correct the relevant EU Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Non-affiliated EU Individuals may contact Northrop Grumman as indicated below to request that Northrop Grumman update or correct relevant EU Personal Data.

Subject to applicable law, Northrop Grumman retains Non-affiliated EU Individual Personal Data in a form that identifies or renders identifiable the relevant Non-affiliated EU Individual only for as long as it serves a purpose that is compatible with the purposes for which the EU Personal Data was collected or subsequently authorized by the Non-affiliated EU Individual, as appropriate.

## **Access**

Non-affiliated EU Individuals generally have the right to access their EU Personal Data. Accordingly, where appropriate, Northrop Grumman provides Non-affiliated EU Individuals with reasonable access to the EU Personal Data Northrop Grumman maintains about them. Northrop Grumman also provides a reasonable opportunity for those Non-affiliated EU Individuals to correct, amend or delete the information where it is inaccurate or has been processed in violation of the EU-U.S. Data Privacy Framework Principles, as appropriate. Northrop Grumman may limit or deny access to EU Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Non-affiliated EU Individual's privacy in the case in question, or where the rights of persons other than the Non-affiliated EU Individual would be violated. Non-affiliated EU Individuals may request access to their EU Personal Data by contacting Northrop Grumman as indicated below.

### **Recourse, Enforcement and Liability**

Northrop Grumman has mechanisms in place designed to help assure compliance with the EU-U.S. Data Privacy Framework Principles. Northrop Grumman conducts an annual self-assessment of its Non-affiliated EU Individual Personal Data practices to verify that the attestations and assertions the company makes about its EU-U.S. Data Privacy Framework Principles privacy practices are true and that the company's privacy practices have been implemented as represented and in accordance with the EU-U.S. Data Privacy Framework Principles.

Non-affiliated EU Individuals may file a complaint concerning Northrop Grumman's processing of their EU Personal Data. Northrop Grumman will take steps to remedy issues arising out of its alleged failure to comply with the EU-U.S. Data Privacy Framework Principles. Non-affiliated EU Individuals may contact Northrop Grumman as specified below about complaints regarding the company's Non-affiliated EU Individual Personal Data practices.

If a Non-affiliated EU Individual's complaint cannot be resolved through Northrop Grumman's internal processes, Northrop Grumman will cooperate with JAMS pursuant to the JAMS International Mediation Rules, available on the [JAMS website](#). JAMS mediation may be commenced as provided for in the relevant JAMS rules. The mediator may propose any appropriate remedy, such as deletion of the relevant EU Personal Data, publicity for findings of noncompliance, payment of compensation for losses incurred as a result of noncompliance, or cessation of processing of the EU Personal Data of the Non-affiliated EU Individual who brought the complaint. The mediator or the Non-affiliated EU Individual also may refer the matter to the U.S. Federal Trade Commission, which has EU-U.S. Data Privacy Framework Principles investigatory and enforcement powers over Northrop Grumman. Under certain circumstances, Non-affiliated EU Individual also may be able to invoke binding arbitration to address complaints about Northrop Grumman's compliance with the EU-U.S. Data Privacy Framework Principles.

## **How to Contact Northrop Grumman**

To contact Northrop Grumman with questions or concerns about this Notice or Northrop Grumman's Non-affiliated EU Individual Personal Data practices:

Write to:

**Corporate Privacy Executive  
Northrop Grumman Corporation  
2980 Fairview Park Drive  
Falls Church, VA 22042**

**Email: [Privacy@ngc.com](mailto:Privacy@ngc.com)**

## **Northrop Grumman Swiss-U.S. Data Privacy Framework Privacy Notice for Non-Affiliated Swiss Individual Personal Data**

**Last Updated: September 27, 2023**

**Last Reviewed: September 25, 2024**

Northrop Grumman Corporation respects your concerns about privacy. Northrop Grumman Corporation and certain of its [U.S.-based affiliates](#) (“Northrop Grumman”) participates in the Swiss-U.S. Data Privacy Framework Principles (“Swiss-U.S. Data Privacy Framework Principles”) framework issued by the U.S. Department of Commerce. Northrop Grumman commits to comply with the Swiss-U.S. Data Privacy Framework Principles with respect to Swiss Personal Data of a Non-affiliated Swiss Individual the company receives from the Switzerland in reliance on the Swiss-U.S. Data Privacy Framework Principles. This Notice describes how Northrop Grumman implements the Swiss-U.S. Data Privacy Framework Principles for Non-affiliated Swiss Individual Personal Data.

For purposes of this Notice:

“Non-Affiliated Swiss Individual” means any natural person who is located in Switzerland, but excludes any individual acting in his or her capacity as an Employee.

“Controller” means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“Swiss Customer” means any entity that purchases or otherwise obtains products or services from Northrop Grumman

“Swiss Employee” means any current, former or prospective employee or contractor of Northrop Grumman or any of its Swiss affiliates or any related individual whose Personal Data Northrop Grumman processes in connection with an employment relationship, who is located in Switzerland. For purposes of this Manual, “Employee” includes any temporary worker, intern, or other non-permanent employee of the company

“Swiss Employee” means any current, former or prospective employee or contractor of Northrop Grumman or any of its Swiss affiliates or any related individual whose Personal Data Northrop Grumman processes in connection with an employment relationship, who is located in Switzerland. For purposes of this Manual, “Employee” includes any temporary worker, intern, or other non-permanent employee of the company

“Processor” means any natural or legal person, public authority, agency or other body that processes Swiss Personal Data on behalf of a Controller.

“Swiss Sensitive Data” means Swiss Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, ideological or trade union related views or activities, sex life, or information on social security measures or



administrative or criminal proceedings and sanctions, which are treated outside pending proceedings.

### **Types of Personal Data Northrop Grumman Collects**

Northrop Grumman obtains Swiss Personal Data, such as contact information, in connection with maintaining its Customer relationships and providing products and services to Customers. Northrop Grumman also obtains Swiss Personal Data of its suppliers' representatives, such as contact information, financial statements and reputational data. Northrop Grumman uses this information to manage its relationships with its suppliers and comply with applicable law or legal requirements.

In addition, Northrop Grumman collects Swiss Personal Data directly from Non-affiliated Swiss Individuals. This collection occurs, for example, when the individual visits Northrop Grumman's websites and provides Swiss Personal Data to the company. The company may use this information to:

- provide products and services;
- send promotional materials or other communications;
- communicate with Customers about, and administer their participation in, special events, programs, offers, surveys and market research;
- respond to Customer inquiries;
- perform data analyses (including anonymization and aggregation of Swiss Personal Data);
- operate, evaluate and improve the company's business (including developing new products and services; enhancing and improving the company's products and services; managing the company's communications; analyzing the company's products, services and communications; and performing accounting, auditing and other internal functions);
- management of customer services including management of negotiations, contracts, transactions, and customer accounts, budgeting, accounting, maintaining records related to customers financials analysis;
- protect against, identify and prevent cybersecurity and other security events, espionage, fraud and other unlawful activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and the company's policies

Northrop Grumman also may use the information in other ways for which the company provides specific notice at the time of collection.

The types of Personal Data Northrop Grumman collects in connection with these activities includes:

- contact information (such as name, postal address, telephone number and email address);
- login credentials for the company's websites;
- photograph, electronic signature, and acknowledgements of company policy;

- other personal information submitted by current or prospective suppliers and subcontractors, such as government issued identifiers, and civil and criminal court history; and
- bank account and financial details;
- other Swiss Personal Data found in content that Non-affiliated Individuals provide.

Northrop Grumman's privacy practices regarding the processing of Non-affiliated Swiss Individual Personal Data comply with the Swiss-U.S. Data Privacy Framework Principles of Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access; and Recourse, Enforcement and Liability.

## **Notice**

Northrop Grumman provides information in this Notice and the company's Online Privacy Notice about its Non-Affiliated Swiss Individual Personal Data practices, including the types of Swiss Personal Data Northrop Grumman collects, the types of third parties to which Northrop Grumman discloses the Swiss Personal Data and the purposes for doing so, the rights and choices Non-affiliated Swiss Individuals have for limiting the use and disclosure of their Swiss Personal Data, and how to contact Northrop Grumman about its practices concerning Swiss Personal Data. Privacy notices pertaining to specific data processing activities also may contain relevant information.

## **Choice**

Northrop Grumman generally offers Non-affiliated Swiss Individuals the opportunity to choose whether their Swiss Personal Data may be (i) disclosed to third-party Controllers or (ii) used for a purpose that is materially different from the purposes for which the information was originally collected or subsequently authorized by the relevant Non-affiliated Swiss Individual. To the extent required by the Swiss-U.S. Data Privacy Framework Principles, Northrop Grumman obtains opt-in consent for certain uses and disclosures of Sensitive Data. Non-affiliated Swiss Individuals may contact Northrop Grumman as indicated below regarding the company's use or disclosure of their Swiss Personal Data. Unless Northrop Grumman offers Non-affiliated Swiss Individuals an appropriate choice, the company uses Swiss Personal Data only for purposes that are materially the same as those indicated in this Notice or the company's Online Privacy Notice

Northrop Grumman may disclose Non-affiliated Swiss Individual Personal Data without offering an opportunity to opt out, and may be required to disclose the Swiss Personal Data, (i) to third-party Processors the company has retained to perform services on its behalf and pursuant to its instructions, (ii) if it is required to do so by law or legal process, or (iii) in response to lawful requests from public authorities, including to meet national security, public interest or law enforcement requirements. Northrop Grumman also reserves the right to transfer Swiss Personal Data in the event of an audit or if the company sells or transfers all or a portion of its business or

assets (including in the event of a merger, acquisition, joint venture, reorganization, dissolution or liquidation).

### **Accountability for Onward Transfer of Personal Data**

This Notice and Northrop Grumman's Online Privacy Notice describe Northrop Grumman's sharing of Non-affiliated Swiss Individual Personal Data.

Except as permitted or required by applicable law, Northrop Grumman provides Non-affiliated Swiss Individual with an opportunity to opt out of sharing their Swiss Personal Data with third-party Controllers. Northrop Grumman requires third-party Controllers to whom it discloses Non-affiliated Swiss Individual Personal Data to contractually agree to (i) only process the Swiss Personal Data for limited and specified purposes consistent with the consent provided by the relevant Non-affiliated Swiss Individual, (ii) provide the same level of protection for Swiss Personal Data as is required by the Swiss-U.S. Data Privacy Framework Principles, and (iii) notify Northrop Grumman and cease processing Swiss Personal Data (or take other reasonable and appropriate remedial steps) if the third-party Controller determines that it cannot meet its obligation to provide the same level of protection for Swiss Personal Data as is required by the Swiss-U.S. Data Privacy Framework Principles.

With respect to transfers of Non-affiliated Swiss Individual Personal Data to third-party Processors, Northrop Grumman (i) enters into a contract with each relevant Processor, (ii) transfers Swiss Personal Data to each such Processor only for limited and specified purposes, (iii) ascertains that the Processor is obligated to provide the Swiss Personal Data with at least the same level of privacy protection as is required by the Swiss-U.S. Data Privacy Framework Principles, (iv) takes reasonable and appropriate steps to ensure that the Processor effectively processes the Swiss Personal Data in a manner consistent with Northrop Grumman's obligations under the Swiss-U.S. Data Privacy Framework Principles, (v) requires the Processor to notify Northrop Grumman if the Processor determines that it can no longer meet its obligation to provide the same level of protection as is required by the Swiss-U.S. Data Privacy Framework Principles, (vi) upon notice, including under (v) above, takes reasonable and appropriate steps to stop and remediate unauthorized processing of the Swiss Personal Data by the Processor, and (vii) provides a summary or representative copy of the relevant privacy provisions of the Processor contract to the Department of Commerce, upon request. Northrop Grumman remains liable under the Swiss-U.S. Data Privacy Framework Principles Swiss if the company's third-party Processor onward transfer recipients process relevant Swiss Personal Data in a manner inconsistent with the Swiss-U.S. Data Privacy Framework Principles, unless Northrop Grumman proves that it is not responsible for the event giving rise to the damage.

Northrop Grumman is also certified that it complies with the Swiss-U.S. Data Privacy Framework Principles as set forth by the U.S. Department of Commerce regarding the collection, use and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Click here to view our EU-U.S. and Swiss-U.S. Data Privacy Framework Principles Notices [www.dataprivacyframework.gov](http://www.dataprivacyframework.gov) and our participating U.S.

subsidiaries. To learn more about the Data Privacy Framework program, and to view our certification, please visit [www.dataprivacyframework.gov/s/participant](http://www.dataprivacyframework.gov/s/participant).

## **Security**

Northrop Grumman takes reasonable and appropriate measures to protect Non-affiliated Swiss Individual Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Swiss Personal Data.

## **Data Integrity and Purpose Limitation**

Northrop Grumman limits the Non-affiliated Swiss Individual Personal Data it processes to that which is relevant for the purposes of the particular processing. Northrop Grumman does not process Non-affiliated Swiss Individual Personal Data in ways that are incompatible with the purposes for which the information was collected or subsequently authorized by the relevant Non-affiliated Swiss Individual. In addition, to the extent necessary for these purposes, Northrop Grumman takes reasonable steps to ensure that the Swiss Personal Data the company processes is (i) reliable for its intended use, and (ii) accurate, complete and current. In this regard, Northrop Grumman relies on Non-affiliated Swiss Individuals to update and correct the relevant Swiss Personal Data to the extent necessary for the purposes for which the information was collected or subsequently authorized. Non-affiliated Swiss Individuals may contact Northrop Grumman as indicated below to request that Northrop Grumman update or correct relevant Swiss Personal Data.

Subject to applicable law, Northrop Grumman retains Non-affiliated Swiss Individual Personal Data in a form that identifies or renders identifiable the relevant Non-affiliated Swiss Individual only for as long as it serves a purpose that is compatible with the purposes for which the Swiss Personal Data was collected or subsequently authorized by the Non-affiliated Swiss Individual, as appropriate.

## **Access**

Non-affiliated Swiss Individuals generally have the right to access their Swiss Personal Data. Accordingly, where appropriate, Northrop Grumman provides Non-affiliated Swiss Individuals with reasonable access to the Swiss Personal Data Northrop Grumman maintains about them. Northrop Grumman also provides a reasonable opportunity for those Non-affiliated Swiss Individuals to correct, amend or delete the information where it is inaccurate or has been processed in violation of the Swiss-U.S. Data Privacy Framework Principles, as appropriate. Northrop Grumman may limit or deny access to Swiss Personal Data where the burden or expense of providing access would be disproportionate to the risks to the Non-affiliated Swiss Individual's privacy in the case in question, or where the rights of persons other than the Non-

affiliated Swiss Individual would be violated. Non-affiliated Swiss Individuals may request access to their Swiss Personal Data by contacting Northrop Grumman as indicated below.

### **Recourse, Enforcement and Liability**

Northrop Grumman has mechanisms in place designed to help assure compliance with the Swiss-U.S. Data Privacy Framework Principles. Northrop Grumman conducts an annual self-assessment of its Non-affiliated Swiss Individual Personal Data practices to verify that the attestations and assertions the company makes about its Swiss-U.S. Data Privacy Framework Principles privacy practices are true and that the company's privacy practices have been implemented as represented and in accordance with the Swiss-U.S. Data Privacy Framework Principles.

Non-affiliated Swiss Individuals may file a complaint concerning Northrop Grumman's processing of their Swiss Personal Data. Northrop Grumman will take steps to remedy issues arising out of its alleged failure to comply with the Swiss-U.S. Data Privacy Framework Principles. Non-affiliated Swiss Individuals may contact Northrop Grumman as specified below about complaints regarding the company's Non-affiliated Swiss Individual Personal Data practices.

If a Non-affiliated Swiss Individual's complaint cannot be resolved through Northrop Grumman's internal processes, Northrop Grumman will cooperate with JAMS pursuant to the JAMS International Mediation Rules, available on the [JAMS website](#). JAMS mediation may be commenced as provided for in the relevant JAMS rules. The mediator may propose any appropriate remedy, such as deletion of the relevant Swiss Personal Data, publicity for findings of noncompliance, payment of compensation for losses incurred as a result of noncompliance, or cessation of processing of the Swiss Personal Data of the Non-affiliated Swiss Individual who brought the complaint. The mediator or the Non-affiliated Swiss Individual also may refer the matter to the U.S. Federal Trade Commission, which has Swiss-U.S. Data Privacy Framework Principles investigatory and enforcement powers over Northrop Grumman. Under certain circumstances, Non-affiliated Swiss Individuals also may be able to invoke binding arbitration to address complaints about Northrop Grumman's compliance with the Swiss-U.S. Data Privacy Framework Principles.<sup>1</sup>

### **How to Contact Northrop Grumman**

To contact Northrop Grumman with questions or concerns about this Notice or Northrop Grumman's Non-affiliated Swiss Individual Personal Data practices:

Write to:

#### **Corporate Privacy Executive**

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<sup>1</sup> Northrop Grumman understands that the U.S. Department of Commerce and the Swiss Federal Data Protection and Information Commissioner will not implement the binding arbitration option until the first annual review of the Swiss-U.S. EU-U.S. Data Privacy Framework Principles framework.

**Northrop Grumman Corporation**  
**2980 Fairview Park Drive**  
**Falls Church, VA 22042**

**Email: [Privacy@ngc.com](mailto:Privacy@ngc.com)**