



**CORPORATE
POLICY**

EFFECTIVE DATE: January 1, 2014

POLICY No. 3.6

Subject: Privacy

Related Policies:

Corporate Policies

Policy No. 1.1 Code of Business Conduct

Forms:

N/A

1. General Policy

Hexcel Corporation ("we", "our", "us") respects individuals' privacy. This Privacy Policy outlines the information we collect and how we use that information. We have certified our Privacy Policy as being consistent with the E.U.-U.S. Safe Harbor Framework (i.e., the Safe Harbor Privacy Principles and Frequently Asked Questions (FAQs) and corresponding answers that clarify and supplement the Principles) as set forth by the U.S. Department of Commerce ("Safe Harbor"). We certify our continued commitment to the Safe Harbor annually. Further information about Safe Harbor, as well as our certification, is available on the Safe Harbor website at www.export.gov/safeharbor.

2. Purpose

To set forth Hexcel's undertakings with regard to the privacy of individual's personal information.

3. Scope/Applicability

This policy is applicable to all of Hexcel's operations and subsidiaries worldwide.

4. What Personal Information Do We Collect?

We collect information that can identify an individual ("Personal Information") in a number of ways:

- Personal Information you provide to us: This may consist of information voluntarily provided to us by individuals when they express an interest in, or submit an employment application to us. We may also collect and store Personal Information about our customers, business partners, agents, contractors, and employees, and use that Personal Information in order to perform, process and facilitate our relationship with them, provide products or services to them, perform contracts we have with them, or comply with our legal and regulatory obligations. By way of example and not limitation, we may collect Personal Information from our employees on an ongoing basis such as name, job title, job background, education, goals, competencies, job requirements and job performance measurements.
- Information Obtained from Third Parties. We may also obtain Personal Information from third parties such as our business partners and affiliates.



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In order to:

- perform contracts with and fulfill orders for products and services from customers and clients,
- design, evaluate, implement and provide human resources programs and services, including but not limited to staffing, compensation, benefits, education, employee diversity, organizational development and payroll,
- provide, maintain and upgrade our systems, networks and processes, and
- comply with laws and regulations applicable to our business,

sometimes we may need to transfer Personal Information to our agents, service providers, affiliates, professional advisors such as lawyers and accountants, business partners or to entities with whom we merge with, buy or are bought by. Sometimes in order to comply with our contractual, legal and regulatory obligations, we may be required to disclose Personal Information to administrative, governmental, or regulatory organizations such as governmental or taxation authorities and supervisory bodies. If the entities with whom we share Personal Information are in a different country, the privacy laws in their country may be different, or less stringent. Nonetheless we will share Personal Information with third parties in accordance with this Privacy Policy only. Questions and complaints about our privacy practices can be submitted by emailing DataPrivacy@Hexcel.com or contacting the Compliance Line at 1-888-203-9066.¹

5. Choice

We collect Personal Information for the purposes described in this Privacy Policy, and we may collect Personal Information for other specific purposes, which you will be informed of upon collection. We will not use your Personal Information for purposes other than those for which it was originally collected or subsequently authorized by you. We will not (i) disclose, or (ii) use for a purpose other than those for which it was originally collected or subsequently authorized by you, any Personal Information that reveals details about your health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or sex life, unless you have given us express permission to do so.

6. Onward Transfers

We may transfer Personal Information to third parties acting as data controllers, such as other Hexcel Group companies, or data processors, who may also be other Hexcel Group companies or third parties who assist with (i) the administration of human resources programs and services, (ii) compliance with our obligations to regulators, and/or (iii) maintenance of our systems, networks and

¹ If you are calling from outside the United States, please access the Compliance Line number by first dialing the AT&T Direct Access Number for the country from which you are calling.



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processes. Transfers to data controllers are covered by the provisions of this Privacy Policy regarding notice and choice. Transfers to data processors will be done only if the data processors have subscribed to the Safe Harbor or we have concluded agreements with such data processors requiring that they provide at least the same level of privacy protection as do the Safe Harbor principles.

Please be aware that in certain circumstances, it is possible that personal information may be subject to disclosure pursuant to judicial or other government subpoenas, warrants, orders or other legal requirement.

7. Access

You have a right to access Personal Information we hold about you by contacting your local Human Resources representative, and you may contact us to request that we correct, amend, or delete Personal Information that is inaccurate. Before making any change to Personal Information, for security purposes and to protect Personal Information from unauthorized access, we may ask for information sufficient to verify the authenticity of an access request. We may limit or deny such requests if it would be unduly burdensome or expensive, or where doing so might adversely affect another person's privacy rights.

8. Security and Data Integrity

We will take reasonable measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration or destruction. We only process Personal Information that is relevant for the purpose for which it is used, and we also take reasonable steps to make sure that Personal Information is reliable for those purposes, and is accurate, complete, and current.

9. Enforcement

We periodically survey our human resources staff and others who manage Personal Information to verify compliance with this Privacy Policy. We will investigate and attempt to resolve questions, complaints or disputes related to this Privacy Policy. Complaints that we are unable to resolve will be submitted to the applicable data privacy authority for resolution.

10. Changes to this Privacy Policy

We may amend this Privacy Policy from time to time. If we do so we will post an updated version on the Corporate Policy section of HexPoint.

SUPERCEDES: CP 3.6 (January 1, 2010)

APPROVED BY: /s/ Ira J. Krakower
General Counsel