



OVERVIEW:

This Privacy Policy (the “**Policy**”) contains the principles that are observed and followed by Celestica Inc. and its subsidiaries (“**Celestica**”) regarding collection, use and disclosure of personal data about Celestica’s prospective, current and former employees, contractors and independent contractors (“**Employees**”).

Celestica respects Employees’ privacy and is committed to protecting personal data in the workplace. This goal is supported by:

- The Celestica Values
- Our Business Conduct Guidelines (BCG)
- Internal policies and procedures
- Supplier and Customer contract provisions
- On-going compliance and audit procedures

This Policy outlines the process, principles and responsibilities to be followed to maintain high standards for how Celestica protects privacy rights and personal data in Celestica.

In this Policy, “**personal data**” includes information about an identified or identifiable Employee that is collected, used or disclosed by Celestica in oral, electronic or written form. Such information may include names, contact details, activity records and files, qualifications, personnel records kept in personal employment files (i.e., offer letters, acknowledgments and performance assessments), payroll and hours of work records, medical and benefit information.

PROCESS:

Celestica collects and maintains Employees’ personal data in connection with Employees’ work or prospective work with Celestica. Access to Employees’ personal data is restricted internally to people with a business need to know. Such personal data may be transmitted domestically and internationally for legitimate business purposes. Personal data may be disclosed to third parties with Employees’ consent, except where its disclosure is for the administration of compensation/benefits plans, or where required pursuant to Celestica’s business purposes or where required to satisfy legitimate investigative or legal requirements.

Generally, Celestica’s privacy protection practices are based on the following principles:

1. **Accountability:** Celestica will be responsible for Employees’ personal data in its possession and under its control in accordance with this Policy and any updated and implementing procedures, published from time to time.

Any inquiries and complaints regarding this Policy or Celestica's practices in respect to personal information should be directed to Todd Melendy, Chief Compliance Officer, Celestica (416) 448-2477.

2. Identifying Purposes: Where the purposes for collecting and processing personal data are not apparent from this Policy or the circumstances (e.g., relating to employment management, human resources, benefit and business administration), the individual Employee will be informed about the purposes for personal data collection and the nature of its processing at the time of collection. Celestica will process Employees' personal data fairly and only for identified purposes or as permitted by this Policy or applicable law.

3. Consent: Consent requirements may vary depending upon region, circumstances, and the type of data that Celestica intends to collect, use, disclose or export, taking into account the purpose, use and disclosure of personal data. Informed and, where required, explicit Employee's consent will be obtained and Celestica will determine which form of consent is appropriate.

4. Limiting Collection: Personal data will only be collected fairly and lawfully and used for the identified purposes set out above. Celestica may also collect Employees' personal data from other sources, including previous employers, personal references or other third parties to whom the Employee has given permission to disclose the information.

5. Limiting Use, Disclosure and Retention: Personal data will only be used and/or disclosed for identified purposes.

Personal data collected in one division of Celestica may be shared with any other division provided such sharing is in compliance with applicable law.

Celestica will protect and limit the use of personal data disclosed to third parties, but Celestica shall not be responsible for the subsequent use or disclosure of Employees' personal data by the third party recipients, including governmental agencies.

Personal data will only be kept as long as is needed, except as otherwise required by applicable law.

6. Accuracy: Processes are established to periodically review the accuracy of personal data collected from Employees. Affected Employees may request that any inaccurate or incomplete personal data Celestica holds about them be amended or deleted.

7. Safeguards: Appropriate organisational, technical and physical security measures will be used to protect Employees' personal data from loss or theft, unauthorised access, destruction, use, modification or disclosure. Celestica requires industry standard data security measures to be used by those third parties who are authorised to process Employees' personal data on Celestica's behalf

8. Openness: Celestica will be transparent about how it processes Employees' personal data. If requested, Celestica will inform Employees' about how their personal data is processed and the rights and remedies they have under this Policy.

9. Individual Access: Employees have the right to access their personal data and to request that any inaccurate or incomplete information be amended. In addition, Employees may object to certain types of processing as expressly permitted by applicable law.

10. Challenging Compliance: Procedures are in place to address internal or external questions or complaints regarding privacy matters. If any Employee complains to their local data protection authority with jurisdiction over Celestica and the data protection authority finds that Celestica has breached these principles, Celestica will abide by the findings of the data protection authority, but reserves the right to challenge or appeal such findings. These principles do not affect any rights any Employee has under applicable law, the requirements of any applicable regulatory data protection authority, or any other type of agreement that the Employee may have with Celestica.

11. International Transfer: As Celestica is part of a global organisation with local operating companies in a number of countries worldwide, it is necessary for Celestica's operation to transfer and process personal data outside the country in which the personal data is collected. Prior to making any such transfer Celestica will put in place security procedures designed to prevent unauthorised use of or access to personal data and to ensure such transfer is only performed in accordance with applicable law. Subject to this, Employees acknowledge and agree that their personal data may be transferred to other countries in which Celestica has operations.

ROLES:

To be effective, protecting private information is a team effort. The following list outlines the roles/responsibilities of various stakeholders that contribute to an on-going positive compliance posture:

1. **Employee Responsibility:** Employees who are responsible for maintaining personal data must ensure that the information is not disclosed inappropriately or misused. Employee questions regarding the management of personal information should be directed to their manager or the owner of the system or process in question.

2. **Manager Responsibility:** Each manager is responsible for ensuring that their employees understand and comply with their responsibilities relating to the protection of privacy rights.

3. **Regional Responsibility:** The regional/country organizations are responsible for on-going compliance to legislation and practices that are applicable to their jurisdiction including annual certification, government reporting and employee awareness campaigns as applicable.

4. **Corporate Responsibility:** The Corporate Legal team is responsible for the on-going Privacy Program in partnership with Human Resources and Information Technology. This team forms the 'Chief Privacy Office' within Celestica. This group implements broad policy and program components and works in partnership with the regional business teams to maintain an adequate compliance posture and to address specific privacy related questions or issues.

APPLICATION AND REVIEW

All Employees must comply with this Policy, including any policies, protocols, guidelines and instructions issued by the Chief Privacy Office and notified to Employees in the workplace.

Celestica's Employees recognise that their communication through any media or other communication equipment provided or made available to them by Celestica in the workplace may be monitored and the information obtained through this monitoring processed for investigative or legal requirements.

Celestica undertakes to regularly review this Policy for necessary updates and reserves the right to amend this Policy accordingly.

Effective date: [May 20, 2010]

Last updated: [June 21, 2010]