

FLUIDIGM CORPORATION

Global Document Retention Policy

June 2018

1. Introduction

1.1. Purpose

Effective records management requires organizing and controlling an ever-increasing volume of data at the time of creation, during its active and inactive periods and when the purpose of the data has concluded. Such data management allows for ease of retrieval when necessary and minimizes storage costs when no longer needed as well as facilitating compliance with both record retention legal obligations and data minimization where privacy laws require deletion. The corporate information of Fluidigm Corporation (“**Fluidigm**”) is important to how it conducts business and manages employees. Fluidigm is committed to complying with all document retention laws. This policy is intended to comply with applicable national and local document retention laws.

1.2. Scope

This policy replaces all existing retention policies.

Definition of “record” or “document”: A record or document is any type of information created, received or transmitted in the transaction of Fluidigm’s business, regardless of the physical format. Examples include, but are not limited to, appointment books and calendars, audio and video recordings, computer programs, filings, notes, invoices, letters and other correspondence, memory in cell phones, records, ledgers, logs, bids and offers even if not successful, sales forms, memos, correspondence, spreadsheets, decks, PowerPoints, reports, drafts, files, emails (and attachments, if any).

This policy is applicable to all Fluidigm records maintained on company equipment. If management approves that Fluidigm records or documents may be transferred onto a personal device, this policy also applies to the protection, maintenance and destruction of such Fluidigm documents on such personal devices.

1.3. Basis for Destruction and Proper Records Management

Most of our corporate records do not require long-term retention. They may be vital to current goals and useful for analysis of current operations, but are of little or no value to Fluidigm once the product or action described is completed. In addition, some data privacy laws actually require the deletion or right to be forgotten in certain instances. In order to comply with these requests, to promptly respond to document production legal requirements or to simply access needed documents in an efficient manner, it is

important that Fluidigm not have to cull through mounds of outdated and no longer needed records. This also makes proper organization, filing and storage of data on an ongoing basis, every day, whether it is electronic or in hard copy, or stored on or off the Fluidigm facilities crucial. Properly labeling of records (whether stored electronically or in file cabinets or boxes, on or off site) to ensure that they can be promptly located is therefore also critically important.

Not only is file maintenance important, but also the manner in which records are ultimately discarded is key to ensure that confidential, proprietary and other sensitive information is not compromised. See Section 5 below.

1.4. Persons Covered

All Fluidigm employees, consultants, contractors and other agents who handle Fluidigm records are subject to this policy.

Records should not be forwarded or shared with persons inside or outside the Fluidigm organization other than on an as needed basis. This not only assists Fluidigm in being able to promptly retrieve all copies of relevant records when required, but also meets our data privacy obligations.

2. Responsibilities

Each department is responsible for maintaining its records in a safe and orderly fashion which allows for the timely retrieval of information.

The records described in the Global Document Retention Schedule are to be routinely and promptly disposed according to the timetable indicated for each category, unless Legal has advised otherwise through a "litigation hold" discussed below.

By necessity, the categories of documents are broad as it is impossible to anticipate every type of record you may encounter. If you are unsure as to what category a particular record belongs, direct your question to Legal at legal@fluidigm.com. Do not destroy the document until Legal has advised you of the proper retention period for such documents. If you have questions related to records which are scheduled, those questions should also be directed to Legal.

No one is authorized to store Fluidigm records offsite, whether in a third-party facility or cloud, unless Legal has approved the storage provider. No Fluidigm records may be maintained on non-company personal devices, other than as approved by Legal or a member of the executive leadership team with oversight of the relevant function. Any stored records must first be mapped for quick retrieval and properly labeled for easy identification.

3. Document Retention Schedule

All records will be retained for a period of time designated by the Global Document Retention Schedule, unless directed by Legal to institute a "litigation hold".

Where documents having more than one retention period cannot be separated from a document having a longer retention period, both documents should typically be retained for the longer period. When in doubt, please consult Legal.

Fluidigm will regularly audit files to ensure that records are retained and discarded consistently with this policy.

4. Exception to the Document Retention Schedule

If you believe, or the Legal Department informs you, that Fluidigm's records are relevant to current litigation, potential litigation, government investigation, audit or other event, you must preserve and not delete, dispose, destroy or change those records, including e-mails, until the Legal Department determines those records are no longer needed. This exception is referred to as a "litigation hold." If you believe this exception may apply or have any questions regarding whether it may possibly apply, please contact the Legal Department immediately.

5. Disposal of Retained Documents

All materials for which disposal is required by this policy must be securely destroyed in a manner appropriate for that record and in a manner that protects the confidentiality of Fluidigm's business as well as the privacy of our customers, employees and others who entrust Fluidigm with their personal and/or confidential information. Depending upon the medium, data should be shredded, burned, recycled in locked confidential containers, deleted or demagnetized in order to render them unreadable following the expiration of the retention period unless a litigation hold has been put in place. All backup and archive copies of a record must be destroyed when the original is destroyed. This includes all electronic forms of the record.

On an ongoing basis, identical duplicate materials should be eliminated. Whenever possible, the official record and/or signatures where applicable, should be retained.

To minimize the risk of unauthorized use or access to such information, when working remotely such as from home or while traveling, all documents containing personal information, proprietary, trade secret or confidential information should be kept with you or locked securely. Do not leave such documents in plain view in hotel rooms or airports for instance. Do not tempt others to "dumpster dive" by disposing of documents at home or while traveling or working remotely in a non-secured fashion in which others could see or use such records. If you do not have shredding or burning disposal capabilities at home or while traveling, keep such documents in your possession until you can properly dispose of them at a Fluidigm facility.