

ITW EAE, a division of Illinois Tool Works, Inc. (also dba: Vitronics Soltec B.V., in The Netherlands)

Privacy statement

General privacy policy

This privacy statement, available at www.itweae.com, is intended to address the following:

1. How ITW EAE will use your data
2. The legal basis for processing your information
3. What to do in case of complaints or questions
4. Access to and disclosure of personal information
5. Amendments to this notice
6. How to contact us

1. How ITW EAE will use your data

This privacy statement tells you what to expect when ITW EAE collects personal information. This applies to information we collect about:

- * customers, suppliers and other persons relating to any complaint or investigation relating to data protection or freedom of information; the following will refer to all customers, suppliers and other persons as customers
- * people who use our services, for example, who make a request or request literature from us;
- * people operating under the General Data Protection Regulation;
- * people operating under other Countries with specific Privacy Law, Regulations or other such requirements governing the handling or management of personal data and or records;
- * applicants, our current and former employees.

Website form submissions

When filling out a form on www.itweae.com or www.despatch.com the data is collected so we may respond with relevant, high-value information. ITW EAE does not share this information with anyone for use outside the company.

Use of cookies by ITW EAE

ITW EAE tracks visitor and prospect activities on its Despatch website and landing pages through the use of cookies. Cookies are set to remember preferences (like form field values) when a visitor returns to the site and for tracking purposes required for marketing automation. These cookies don't store personally identifying information, only a unique identifier.

E-mail communication

Occasionally we may deliver email through marketing campaigns, this may be internally managed or processed using an external provider. We may collect statistics on email open rates and clicks using standard technologies to help us monitor and improve our communications. We intend to confirm compliance of Privacy Regulations with external service providers before using their services. Customers receiving such communication from ITW EAE will always be provided an opportunity to *unsubscribe* to future communications.

People who contact us through social media

If you contact us via social media, including Facebook, Twitter, LinkedIn and YouTube, we will respond to your request and use the details you have provided us with to address your question or request. Your personal data will be stored as necessary in accordance with our retention policy.

People who call us

We provide support to potential and current customers, suppliers and other third parties. When you call us, we do not record the calls. If we need to process your request, we will only collect the required information to process your request in the most efficient manner. This data may be passed on to other internal departments, external parties (e.g. service technicians) so that we may address and resolve the issue as quickly as possible.

People emailing us

Every e-mail sent to us, including any attachments, can be monitored and used by us for reasons of security and to monitor compliance with our IT policies. Email monitoring or software to block e-mails can also be used. Please note that you have a responsibility to ensure that any email you send to us is within the limits of the law.

People who use the services of ITWEAE

We work with external service providers, such as service contractors, transport companies and other suppliers. To deal with servicing your business needs, we need to share information with these third parties, but they are only provided with the information needed to complete the investigation.

We will need to retain data of customers whom have been a recipient of our services or products. We use this information only to provide the service requested by the individual and for other closely related purposes. For example, we may use information about people who have purchased a product to conduct a satisfaction survey regarding our products or personnel. When people subscribe to our services, they can cancel their subscription at any time by mailing their request to Privacy@itweae.com. This request will be processed and completed within 30 days of receipt.

Candidates, current and former ITWEAE employees

When individuals apply to job openings at ITW EAE, we will only use the information provided to process their application and to monitor recruitment statistics. ITW EAE will not disclose information to a third party (for example: to conduct background investigations) without obtaining the prior written approval from the applicant as required by law.

Personal data about rejected candidates will be retained in accordance with our retention policy after the recruitment process has been completed and will be destroyed thereafter.

As soon as a person joins ITW EAE, we will compile a file relative to their employment. The information in this file is secured and will only be used for purposes that are directly relevant to that person's employment. After their employment at ITW EAE has ended, we store the file in accordance with the requirements of our storage plan and the file will then be removed.

Summary Objective

In general, when your personal data is collected and stored, it will only be used for the purposes described herein and or only for the purposes that we explain to you at the time we collect your personal data. We may need to use your personal data for other purposes that are not mentioned above so that we can better service our customers and their needs. We will strive to provide you with the most up to date information regarding protecting your personal data at the time we collect such information.

2. The legal basis for processing your information

Our legal basis for collecting and using the personal information described above depends on the personal information in question and the specific context in which we collect it.

However, we will normally only collect your personal information as necessary to enter into a contract with you or your organization, or if the processing is in our legitimate interests and is not undermined by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal

information from you or otherwise need personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to contact you, we will notify you at the relevant time and advise you if the provision to retain your personal information is mandatory (and of the possible consequences if we are not able to collect your personal data).

Also, if we collect and use your personal information for legitimate interests (or those of a third party), we will disclose those legitimate interests to you at the relevant time.

If you have any questions or need further information about the legal basis on which we collect and use your personal information, please contact us using the contact information provided below under the heading 'Contact us'.

3. What to do in case of complaints or questions

ITW EAE tries to comply with the highest standards when collecting and using personal data. For this reason, we take all the complaints we receive very seriously. We encourage your comments if you believe that our collection or use of information is unfair, misleading or inappropriate. We would also like hear about any suggestions that you may have for improving our procedures.

This privacy statement is intended to provide an understanding of our data protection privacy policies; it may not contain complete information about all aspects of ITW EAE's collection and use of personal data. If you should have any specific questions or concerns a member of the ITW EAE team is willing to assist you. All requests for such information should be sent to the address below under the heading 'Contact us'.

4. Access to and disclosure of personal information

You have the following data protection rights:

- If you wish to retrieve, correct, update or delete your personal data, you may do so at any time by contacting us using the contact details provided in the "Contact us" section below.
- In addition, you can object to the processing of your personal data, ask us to limit the processing of your personal data or ask for the transferability of your personal data. Once again, you can exercise these rights by contacting us using the contact information provided under the heading 'Contact us' below.
- You have the right to unsubscribe from any marketing communications that we send to you at any time. You can exercise this right by clicking on the "*unsubscribe*" link in the marketing emails that you may receive. To unsubscribe from other forms of marketing (such as post-marketing or telemarketing), please contact us using the contact details provided under the heading 'Contact us' below.
- Once we have collected and processed your personal data with your consent, you may withdraw your consent at any time. The withdrawal of your consent does not affect the activity carried out by us prior to your request, nor will it affect the processing of your personal information carried out legally beyond the basis of Consent.
- You have the right to complain to a data protection authority about our collection and use of your personal data by ITW EAE. Please contact your local data protection authority for more information.

We respond to all requests we receive from individuals and or organizations who wish to exercise their data protection rights in accordance with applicable data protection legislation.

Disclosure of personal information

We may share your personal information with the following categories of recipients:

- Our sister companies, third party service providers and partners who process our data (for example, to support the provision of, the functionality of, or the improvement of the security of our website) or who otherwise process personal data for purposes described in this privacy statement will be notified to you when we collect your personal data. Any competent law enforcement authorities, regulatory authorities, government agencies, courts or other third parties whom we deem necessary to be disclosed (i) as a matter of applicable law or regulation, (ii) to exercise, adopt or defend our legal rights, or (iii) to protect your vital interests or those of another person;
- A potential buyer (and its agents and or advisers) regarding a proposed purchase, merger or acquisition of our business activities, provided that we inform such buyer, agents and advisers that your personal information shall only be used for the purposes stated in this privacy statement;
- Any other person with your consent to the disclosure.

International transfers

As EAE is a global organization, your personal information may be transferred to and processed in countries other than your home country, for example we may share your information with sister companies and/or service providers located outside or your country/region. These countries may have data protection laws that differ from those in your country.

However, we have taken appropriate precautions to require that your personal information remains protected in accordance with this privacy statement

5. Amendments to this notice

This privacy statement was implemented on May 25th of 2018 and last updated on December 18, 2018.

6. How to contact us

If you would like to request information about our privacy policy, please email us at Privacy@itweae.com or write to us at:

ITW EAE
c/o Vitronics Soltec B.V.
Innovatiepark 12
4906AA OOSTERHOUT
The Netherlands

ITW EAE

Responding to Requests from Data Subjects

1. Introduction

- 1.1 EU data protection laws give individuals whose personal information is used (also known as “data subjects”) certain rights in respect of that information. Where ITW EAE is acting as controller, (i.e. the entity that is in control of the personal information) it is responsible for fulfilling these rights. These guidelines set out how ITW EAE deals with a valid request from an individual to exercise those rights (“Request”).
- 1.2 These guidelines do not apply ITW EAE's response to unrelated third parties' requests for such data (such as governmental demands).

2. Rights summary

- 2.1 Where required under applicable law, ITW EAE will assist data subjects in exercising the following rights:
- (a) **Right to be informed:** every individual has the right to receive clear, concise information about how their personal information is collected and what it is used for. This is done by way of employee privacy notice in the employee handbook or website privacy notice.
 - (b) **Right of access:** an individual has the right to obtain confirmation whether a controller processes personal information about them and, if so, to be provided with details of that personal information and access to or a copy of it.
 - (c) **Right of rectification:** this is a right for an individual to obtain without undue delay of inaccurate personal information a controller may process about them.
 - (d) **Right to erasure:** also known as the 'right to be forgotten', an individual can require a controller to erase personal information about them on certain grounds – for example, where the personal information is no longer necessary to fulfil the purposes for which it was collected.
 - (e) **Right to restriction:** this is a right for an individual to require a controller to restrict processing of personal information about them on certain grounds.
 - (f) **Right to data portability:** an individual has the right in certain situations to receive their personal information from a controller in a structured, commonly used and machine-readable format and to transmit that information to another controller.
 - (g) **Right to object:** this is a right for an individual to object, on grounds relating to their particular situation, to a controller's processing of personal data about them, if certain grounds apply.
 - (h) **Rights in relation to automated decision making:** individuals have the right not to be subject to automated decisions which have legal effects on them in certain circumstances.
- 2.2 All of these rights must be fulfilled without delay and at most within one month. ITW EAE must provide the service free of charge, unless the Requests are repetitive or excessive.

3. Self-Service Procedure

3.1 ITW EAE provides employees with access to personal information that pertains to them and that ITW EAE holds about them. ITW EAE allows employees to access much of the Personal Data that we hold about them via Werknemersloket and such accounts can be used to access.

3.2 All other Requests are addressed as set forth below.

4. Submission and Receipt of a Request

4.1 An ITW EAE employee may submit a Request by writing to the person listed in ITW EAE 's Employee Privacy Notice or by contacting their local human resources representative.

4.2 Any other individuals may submit a Request by writing to Privacy@itweae.com as specified in the ITW EAEs Privacy Policy.

4.3 Anyone who receives a Request from a data subject should record the date on which the Request was received together with any other relevant information.

Note: A Request can take any written form – via letter, via email, if it is sufficiently clear. There is no requirement for the requestor to use certain terms such as 'right to rectification' or cite legislation such as the Data Protection Act or General Data Protection Regulation. As long as the request is from an individual, in writing, and refers to that individual's personal information, it could be a valid Request and should be passed to Privacy@itweae.com immediately. Examples include 'I want to see a copy of all the data you're holding about me' (Right of Access) or 'I want you to send my HR file to my new employer' (Right to Portability).

4.4 All Requests for their personal information from a data subject should be given to the privacy officer as soon as possible.

4.5 The privacy officer logs all Requests.

5. Initial steps

5.1 The privacy officer will make an initial assessment of the Request to decide whether it is valid and whether confirmation of identity, or any further information, is required. The privacy officer will then contact the individual in writing to confirm receipt of the Request and seek confirmation of identity or further information.

5.2 The requestor is not obliged to provide additional information however it can greatly aid his/her Request if we know what he/she is looking for. Often very wide requests can be focussed like this, saving ITW EAE a significant administrative burden.

5.3 The privacy officer will then assess whether the Request meets the criteria for that particular right. If the criteria are met the privacy officer will consider how best to fulfil the individual's right(s) and respond in full. If the criteria are not met, the privacy officer will write to the individual explaining why.

5.4 The following examples set out how the privacy officer may respond to a particular Request in compliance with EU data protection laws:

(a) **Right of access:** Confirm whether or not Personal Information concerning the requestor him or her are being processed, and, where that is the case, inform the requestor as to the

Personal Information being processed as well as the purposes of the processing, categories of Personal Information concerned, the recipients or categories of recipients to whom the information has or will be disclosed etc.). Provide access to or a copy of the Personal Information.

- (b) **Right to rectification:** Correct inaccurate data concerning the requestor. Taking into account the purposes of the processing, the data subject has the right to have incomplete Personal Information completed, including by providing a supplementary statement.
- (c) **Right to erasure:** Where the Personal Information is no longer necessary in relation to the purposes for which it was processed, and if there is no legal obligation or other basis recognized by GDPR to retain the information, erase Personal Information.
- (d) **Right to restriction:** Where a data subject has contested the accuracy of data, and a period of time is required to verify the accuracy of the Personal Information, restrict processing until this verification is complete.
- (e) **Right to data portability:** Where the requestor has given consent, provide to the requestor the Personal Information which he or she has provided to ITW EAE, in a structured, commonly used and machine-readable format and, if requested, and to transmit that information to another controller.

5.5 When a Request for rectification or erasure of Personal Information or restriction of processing, ITW EAE should, in compliance with applicable law, notify recipients to whom the data were previously disclosed, unless this proves impossible or involves a disproportionate effort.

6. Exceptions

6.1 ITW EAE is not obliged to comply in full with every Request. In general, ITW EAE exceptions fall into the following scenarios:

- (a) to meet the request fully would be impossible or prove a disproportionate burden;
- (b) where to do so would reveal confidential commercial information (Requests can be redacted in such circumstances);
- (c) where to do so would reveal personal information about another individual (Requests can be redacted, or the consent of the other individual obtained); or
- (d) public interest exemptions.

6.2 Under EU data protection law, EU member states are permitted to make additional exceptions as long as they are proportionate to safeguard national security or in the public interest etc. Exceptions can be complex and involve local legal judgments so always follow the procedure above and refer to ITW Legal for further support.

7. Questions and Complaints

7.1 If you have any questions about these guidelines or how to handle a data subject request, please contact the privacy officer at Privacy@itweae.com.

- 7.2 If you receive a complaint from an individual who is unsatisfied with ITW EAE response, please refer them to your contact at ITW EAE, who will review the complaint with the privacy officer.
- 7.3 Individuals who have made Requests and are unsatisfied with the outcome also have the right to complain to your local supervisory authority.