

## ACTUANT PRIVACY NOTICE (TIER 4)

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Actuant Corporation collecting/processing their personal data.

2.2 All employees of Actuant Corporation who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

#### 3.1 Who are we?

Actuant Corporation is a diversified industrial company with operations in more than 30 countries. The Actuant businesses are market leaders in branded hydraulic tools as well as highly engineered position motion control systems. Actuant business operations are divided into three segments focused on the niche markets we serve.

The **Industrial** segment is primarily involved in the design, manufacture, and distribution of branded hydraulic and mechanical tools to the maintenance, industrial, infrastructure and production automation markets. We provide high force hydraulic tools for use in end-market applications as diverse as positioning the roof on the Olympic Stadium in Beijing to lifting and positioning aircraft wings on today's largest aircraft prior to attachment.

The **Energy** segment provides joint integrity products and services, as well as umbilical, rope, and cable solutions to the global oil and gas, power generation, and other energy markets. The key aspects of businesses in the energy segment are safety, productivity, and uptime.

The **Engineered Solutions** segment provides engineered position & motion control, power transmission and other industrial systems to OEMs in various vehicle markets. Our products include harsh-environment electronic controls and instrumentation, container hardware and aerospace batteries.

Our Data Protection Officer can be contacted directly here:

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## 3.2 Personal Data

Under the EU's General Data Protection Regulation (GDPR), personal data is defined as any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Personal data will only be processed by Actuant Corporation in a reasonable, lawful and fair manner. This means that Actuant Corporation will process personal data in compliance with applicable data protection laws and/or other laws and regulations. Examples of common types of personal data include name, address, social security number, salary details and financial information, CV's, employee records and reviews, and references regarding employees.

The GDPR distinguishes between *ordinary* personal data such as name, address and telephone number and *sensitive* personal data including information relating to health, sexual orientation, racial or ethnic origin, political opinions, religious beliefs, and trade union membership. Under the law the processing of sensitive personal data is subject to additional and stricter conditions.

Employee personal data is processed by Actuant Corporation for the purposes of employment management and compliance with legal requirements. Individuals should note that IR will only process sensitive personal data in limited circumstances.

Where required by law, the explicit consent of the individuals to such processing will be obtained. Actuant Corporation will take appropriate security measures to safeguard sensitive personal data and to ensure its confidentiality

This Policy is intended to clarify how Actuant Corporation will process employee's and external applicants/candidates personal data including *sensitive* personal data. References to employees covers external applicants/candidates where applicable.

In order to operate effectively and to meet its legal requirements, Actuant Corporation needs to process personal data for employment-related purposes. Where it does so, personal data will be collected for specified, explicit and legitimate purposes and not further processed in a way incompatible with these purposes. Processing of certain data will for some activities continue after employees have left the service of Actuant Corporation.

Examples of the main ways in which Actuant Corporation processes personal data in an employment context may include the following:

1. Recruiting and staffing;
2. Administration of salaries and expenses, pension, sickness benefit or other payments and contributions due under the contract of employment;
3. Monitoring absence or sickness under an absence control policy;
4. Administration of incentive compensation programs;
5. Training and development, including performance appraisals;

6. Management planning;
7. Appraisal, promotion and salary progression reviews;
8. Negotiations with trade unions or other employee representatives;
9. Administration of Actuant Corporation policies;
10. Compliance with any legal requirement to provide information about employees including regarding tax payments or employee membership lists to unions;
11. Administration of any applicable disciplinary and grievance procedures;
12. Compilation of employee lists and contact information for both internal and external use;
13. Production of employee ID cards;
14. Monitoring the use of Company resources;
15. In relation to the provision of company services and other services;
16. To contact emergency contacts or emergency services in the event of an emergency, for example, illness or serious injury to an employee.

Employees and external candidates/applicants are asked to provide personal data at the point of application and throughout their employment for the purposes mentioned above. Actuant Corporation will inform employees of any material changes in the way in which employee personal data is used.

Employee data maintained by Actuant Corporation will be used for the purposes, as mentioned above, of supporting company operations and providing employee benefits and compensation. Actuant Corporation HR and Payroll processes include tasks and procedures to keep personal data accurate, complete and current.

### 3.3 **Consent**

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified. Consent is required for Actuant Corporation to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by following the process set forth in the Withdrawal of Consent Procedure, GDPR DOC 2.7A.

### 3.4 **Disclosure**

Actuant Corporation is comprised of a group of companies worldwide. Certain employee data contained on the centralized database will be accessible to other members of the Actuant Corporation companies, such as the United States and/or other countries, for the purpose of employee management and as outlined in this Policy. Additionally, there are situations when personal data relating to employees is transmitted to third parties (EU or non-EU based) to provide HR related services for Actuant Corporation, such as payroll services, compensation, expenses, employee engagement surveys, cultural and/or employee engagement assessments, healthcare services and other employee benefits and services/information required by law.

In addition, Actuant Corporation, like many businesses, sometimes hires other companies (EU and non-EU based) to perform certain business-related functions. Examples include mailing information, maintaining databases and processing payments. When Actuant

Corporation retains a non-affiliated company to perform a function of this nature, such third party will be required to take security measures to appropriately protect the data. Personal data may also be proportionately disclosed by Actuant Corporation to other third parties as required by law, for compliance with legal requirements or to defend a legal claim, in an emergency to protect the vital interests of an employee, in cases of business requirements (such as the sale of a business unit), or where the consent of the employee has been obtained

Actuant Corporation has the authority to change or terminate this policy in whole or in part at any time, without prior notice to or the consent of any employee, unless otherwise described by local and/or European legislation and requirements.

### 3.5 **Retention period**

Actuant Corporation will process personal data and will store the personal data for as described in Actuant Corporation's Retention Period Procedure, GDPR DOC 2.3.

### 3.6 **Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organization.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Actuant Corporation refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

### 3.7 **Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Actuant Corporation (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Actuant Corporation's Data Protection Officer.

### 3.8 **Privacy statement**

Read more about how and why we use your data in the Actuant Corporation privacy statement found at [www.actuant.com](http://www.actuant.com).

## **Document Owner and Approval**

The Data Protection Officer or designee is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the requirements of the GDPR.

A current version of this document is available to all employees on the Actuant corporate intranet ("the HUB") and through Human Resources. It does not contain confidential information and can be released to relevant external parties.