

# CENTROMOTION PRIVACY SHIELD POLICY

CrossControl AB is a wholly owned subsidiary of CentroMotion.

CentroMotion respects individual privacy and values the confidence of its customers, employees, vendors, business partners and others. CentroMotion strives to collect, store, process and distribute Personal Information in a manner consistent with the laws of the countries in which it does business, as well as the GDPR. CentroMotion participates in and abides by the EU-U.S. Privacy Shield Framework developed by the U.S. Department of Commerce and the European Commission. This Data Protection and Privacy Policy (the "Policy") sets forth the privacy principles that CentroMotion follows with respect to Personal Information transferred to CentroMotion from anywhere in the world, including transfers from the European Economic Area (EEA) (which includes the twenty-eight member states of the European Union (EU) plus Iceland, Liechtenstein and Norway).

## **I. PRIVACY SHIELD**

The United States Department of Commerce and the European Commission have agreed on a set of data protection principles to enable U.S. companies to satisfy the requirement under EU law that adequate protection be given to Personal Information transferred from the EU to the United States (EU-U.S. Privacy Shield Framework). To learn more about the Privacy Shield program, and to view CentroMotion's certification, please visit <http://www.privacyshield.gov/list>.

CentroMotion has a Data Protection Officer who assists in ensuring compliance with this Policy and data security issues. CentroMotion educates its employees concerning compliance with this Policy and has self-assessment procedures in place to assure compliance. CentroMotion's Data Protection Officer, Nicholas Gemmell, and its corporate legal team are available to any of its customers, employees, business partners or others who may have questions concerning this Policy or data security practices. Relevant contact information is provided herein. CentroMotion is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission with respect to the Privacy Shield Framework.

CentroMotion's Privacy Shield Policy can be found [here](#).

## **II. SCOPE**

This Policy applies to all Personal Information received by CentroMotion in any

format including electronic, paper or verbal. CentroMotion collects, stores and processes Personal Information concerning current and former employees, as well as applicants for employment through its Internet websites, its intranet site, electronic mail and manually. CentroMotion will not sell or share this information with third parties in ways different than what is disclosed in this Policy. On a global basis, CentroMotion will establish and maintain business procedures that are consistent with this Policy. Notwithstanding the foregoing, CentroMotion has separate policies governing the processing of employee personal data and external personal data in those countries that are members of the EU. These policies are consistent with EU data protection law.

CentroMotion collects, stores, and processes Personal Information from current and past employees and applicants for employment, such as name, contact information, government identifier, financial account information, and family information. This information is maintained at the Corporate and local level by CentroMotion and its authorized agents, depending on the level of the position as well as the local office of the employee or applicant. CentroMotion collects Personal Information for employment related purposes and legitimate human resource business reasons such as personnel and job candidate administration and assessment, recruitment and staffing; payroll administration; absence monitoring; training and development; management planning; appraisal and promotion; union negotiation; production and publication of company address books and telephone and e-mail directories; managing email and other communication systems; production of employee Identity cards; monitoring the use of company resources; information to contact close relatives in case of emergency; filling employment positions; administration and operations of its benefit and compensation programs; meeting governmental reporting requirements; security, health and safety management; performance management; company network access; managing and administering the Ethics Hotline; facilitating workplace communications; workforce analytics, and authentication. CentroMotion does not request or gather information regarding political opinions, religion, philosophy or sexual preference. To the extent CentroMotion maintains information on trade union membership, medical health, race or ethnicity; CentroMotion will protect, secure and process that information in a manner consistent with this Policy and applicable law.

CentroMotion also collects, stores, and processes Personal Information from prospective customers, vendors, professional advisers and consultants, distributors, dealers, suppliers, business partners and others, such as name, contact and financial information. This information may be maintained at its corporate offices in Menomonee Falls, Wisconsin or at other CentroMotion facilities, and its authorized agents, consistent with local legislation. CentroMotion collects this Personal Information for, among other things, legitimate business reasons such as processing and fulfilling orders; customer service; the provision of services or products to CentroMotion, product, warranty and claims administration; meeting governmental reporting and records requirements; maintenance of accurate accounts payable and receivable records; marketing; internal marketing research; safety and performance management; financial and sales data; and contact information. All Personal Information collected by CentroMotion will be used for legitimate business purposes consistent with this Policy.

CentroMotion may process and disclose Personal Information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a corporate transaction in which an CentroMotion business is acquired by or merged with another business, or sells, liquidates, or transfers all or a portion of its assets.

CentroMotion also may process or disclose Personal Information as is reasonably necessary or legally required on important public interest grounds, to respond to lawful requests by public authorities (including to meet national security or law enforcement requests), to meet governmental reporting or records requirements, or for the establishment, exercise or defense of legal claims by CentroMotion or other companies within its corporate group.

### **III. DEFINITIONS**

For purposes of this Policy, the following definitions shall apply:

“Agent” means any third party that processes Personal Information provided by CentroMotion to perform tasks on behalf of or at the instruction of CentroMotion.

“CentroMotion” means CentroMotion, its subsidiaries, divisions and groups, with subsidiaries/brands such as Enerpac, Simplex, Larzep Hydraulic, Precision-Hayes International, Milwaukee Cylinder, Hydratight, Cortland, Mirage, Maximatecc,

Weasler, Gits Manufacturing Co., CrossControl, Power-Packer, Elliott Manufacturing and Equalizer.

“Personal Information” means any information or set of information that identifies or could be used by or on behalf of CentroMotion to identify an individual. Personal Information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal Information.

“Sensitive Personal Information” means Personal Information that reveals race, ethnic origin, trade union membership, political opinions, or religious or philosophical beliefs, that concerns health or sex life, or that contains criminal records. In addition, CentroMotion will treat as Sensitive Personal Information any Personal Information received from a third party where that third party treats and identifies the Personal Information as sensitive.

#### **IV. PRIVACY PRINCIPLES**

CentroMotion commits to subject the Personal Information covered by this policy to the following principles:

(1) NOTICE: Where CentroMotion collects Personal Information directly from individuals, it will inform them about the purposes for which it collects, stores and processes Personal Information about them, the types of non-Agent third parties to which CentroMotion discloses that information, and the choices and means, if any, CentroMotion offers individuals for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to CentroMotion, or as soon as practicable thereafter, and in any event before CentroMotion uses the information for a purpose other than that for which it was originally collected.

(2) CHOICE: CentroMotion will offer individuals the opportunity to choose (opt-out) whether their Personal Information is (a) to be disclosed to a non-Agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For Sensitive Personal Information, CentroMotion will give individuals the opportunity to affirmatively and explicitly consent (opt-in) to the disclosure of the information to a non-Agent third party or the use of the information for a purpose other than the

purpose for which it was originally collected or subsequently authorized by the individual.

CentroMotion will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

(3) DATA INTEGRITY AND PURPOSE LIMITATION: CentroMotion will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. CentroMotion will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete and current.

(4) ACCOUNTABILITY FOR ONWARD TRANSFER: CentroMotion uses third-party Agents to assist us in accomplishing the purposes described in this Policy, for example to support our customers, perform technical operations, and store and transmit data. CentroMotion will confirm that any third party to which it discloses Personal Information will appropriately safeguard the privacy of that Personal Information. Examples of appropriate privacy safeguards include: a contract obligating the third party to provide at least the same level of protection as is required by the relevant privacy principles, the third party being subject to EU data protection law, Privacy Shield certification by the third party, or the third party being subject to another European Commission adequacy finding (e.g., companies located in Switzerland). Where CentroMotion has knowledge that a third party is using or disclosing Personal Information in a manner contrary to this Policy, CentroMotion will take reasonable steps to prevent or stop the use or disclosure. CentroMotion holds third parties to which it discloses Personal Information accountable for maintaining the trust our employees and customers place in the company. CentroMotion may remain liable under the Privacy Shield Principles if any Agent processes Personal Information in a manner inconsistent with the Privacy Shield Principles, unless CentroMotion first demonstrates that it is not responsible for the event giving rise to the damage.

(5) ACCESS AND CORRECTION: Upon request, CentroMotion will grant individuals reasonable access to Personal Information that it holds about them. In addition, CentroMotion will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any

employees that desire to review or update their Personal Information can do so by contacting their local Human Resources Representative.

(6) **SECURITY:** CentroMotion will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. CentroMotion protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal Information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. CentroMotion limits access to Personal Information and data to those persons in CentroMotion's organization, or as Agents of CentroMotion, that have a specific business purpose for maintaining and processing such Personal Information and data. Individuals who have been granted access to Personal Information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

(7) **RECOURSE, ENFORCEMENT, AND LIABILITY:** CentroMotion will conduct compliance audits of its relevant privacy practices to verify compliance with this Policy and the relevant privacy principles. Any employee that CentroMotion determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

## **V. DISPUTE RESOLUTION**

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the CentroMotion Data Protection Officer via the contact information below. CentroMotion will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy and as required by law.

## **VI. INTERNET PRIVACY**

CentroMotion sees the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with consumers, employees, vendors, business partners and others. CentroMotion recognizes the importance of maintaining the privacy of Personal Information collected through websites that it operates. CentroMotion's purpose for operating its websites is to provide information

concerning products and services to the public. In general, visitors can reach CentroMotion on the Web without revealing any Personal Information. Visitors on the Web may elect to voluntarily provide Personal Information via CentroMotion websites but are not required to do so. CentroMotion collects information from visitors to the websites who voluntarily provide Personal Information by filling out and submitting online questionnaires concerning feedback on the website, requesting information on products or services, or seeking employment. The Personal Information voluntarily provided by website users is contact information such as the user's name, home and/or business address, phone numbers and email address. CentroMotion collects this information so it may answer questions and forward requested information. CentroMotion does not sell this information.

CentroMotion may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. Company personnel periodically audit CentroMotion's commercial websites to determine what cookies are used on each. The cookies used are typically not intrusive and are not typically connected to visitors' contact or other identifiable information. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. Visitors can learn how to control or delete cookies used on CentroMotion's websites by visiting <http://www.aboutcookies.org> for detailed guidance. If visitors do suppress the website cookies, however, some areas of CentroMotion websites may not function properly.

The table below describes the cookies used on [www.centromotion.com](http://www.centromotion.com) and other CentroMotion related websites.

### **Session Cookies**

We use a session cookie that lasts for the duration of your visit to our site and is used for load balancing. User data is linked to your contact information if you agree to the use of cookies for the purpose of enhancing your browsing experience and to personalize information to your interests.

### **Persistent Cookies for Site Analytics**

Google Analytics – we use this to understand how the site is being used in order to

improve the user experience. User data is not linked to any of your contact information.

You can find out more about Google's position on privacy as regards its analytics service at <https://support.google.com/analytics/answer/6004245?hl=en>

Adobe Site Catalyst – we use this to understand how the site is being used in order to improve the user experience. User data is not linked to any of your contact information.

You can find out more about Adobe's position on privacy as regards its analytics service at <http://www.omniture.com/en/privacy/product>

Few, if any, of CentroMotion's websites are directed toward children. Nevertheless, CentroMotion is committed to complying with applicable laws and requirements, such as the United States' Children's Online Privacy Protection Act ("COPPA")

### **How To Disable Cookies**

When you visit our website for the first time on your device, and on subsequent visits after you've cleared cookies, you have the ability to accept or decline cookies via a pop up notification.

If you choose to accept cookies but then change your mind don't worry. You can disable cookies by clearing cookies in your browser settings and then clicking the decline option when you return to our website. Please be aware that if you suppress website cookies some areas of our website may not function properly.

For further more information, including how to clear and disable cookies visit the [about cookies website](#).

CentroMotion website users have the option to request that CentroMotion not use information previously provided, correct information previously provided, or remove information previously provided to CentroMotion. Those that would like to correct or suppress information they have provided to CentroMotion should forward such inquiries to:

### **CentroMotion**

N86 W12500 Westbrook Crossing  
Menomonee Falls, Wisconsin 53201-3241  
Attention: Global L&E Counsel

Or:

**CentroMotion**

Bentley Road South  
Darlaston, West Midlands  
WS10 8LQ  
United Kingdom

Attention: Data Protection Officer

The inquiries should include the individual's name, address, and other relevant contact information (phone number, email address). CentroMotion will use all reasonable efforts to honor such requests as quickly as possible.

CentroMotion websites may contain links to other "non-CentroMotion" websites. CentroMotion assumes no responsibility for the content or the privacy policies and practices on those websites. CentroMotion encourages all users to read the privacy statements of those sites; their privacy practices may differ from those of CentroMotion.

**VII. CHANGES TO THIS POLICY**

The practices described in this Policy are current personal data protection policies as of May 21, 2018. CentroMotion reserves the right to modify or amend this Policy at any time consistent with the requirements of the relevant principles and applicable law. Appropriate notice will be given concerning such amendments.

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For CentroMotion's Privacy Notice, please [click here](#).