



## ***Gates Argentina, S.A. Privacy Policy***

### **POLICY STATEMENT**

Gates Argentina, S.A., C.U.I.T. 30677784144, domiciled at Bartolomé Cruz 1810, Province of Buenos Aires, a private limited liability company under Argentine law, (“Gates”/ “we”/ “us”) is committed to protecting and respecting any personal information you share with us . Gates will be acting as responsible for databases for the processing activities described in this Policy, which means that we define the purposes and the means for these processing activities, in compliance with the Personal Data Protection Law No. 25,326, as amended and complemented by related regulations issued from time to time by the Data Protection Authority (“applicable laws”).

This Policy describes (i) what types of personal data we collect from you, (ii) how it is used by us, (iii) how we share it with others, (iv) how you can manage the personal data we hold (*i.e.*, your rights), and (v) how you can contact us to exercise your rights.

We will always give you the option to choose not to receive marketing communications from us. We will never send you unsolicited ‘junk’ email or communications, or, to the best of our knowledge, share your data with anyone else who might. We do not sell your information to third parties, but we do work closely with selected partners who help us to provide you with the information, products and services that you request from us.

The contents of this Policy may change so please check this page from time to time. When required, we will also contact you directly (*e.g.*, by sending you an email) to notify you of any substantial changes.

This version of our Policy is effective as of January 1, 2023.

### **WHAT INFORMATION DO WE COLLECT?**

*We collect information about you when you engage with our website, applications and/or authorised distribution network. We only collect information which is necessary, relevant and adequate for the purpose for which you are providing it to us.*

We collect information about you when you use Gates websites (such as <https://www.gates-argentina.com.ar/>), applications and customer service centres. Some of this information does not identify you personally but provides us with information about how you use our services and engage with us (we use this information to improve our services and make them more useful to you).

The information we collect includes some or all of the following:



1. Where you engage us in a business context, we may collect your name and surname, job title, company contact details (including email addresses), and company details (some of which we may obtain from an online or public business directories);
2. The date and time you used our services;
3. The pages you visited on our website and how long you visited them;
4. Your IP address;
5. The internet browser and devices you are using;
6. Cookies, Pixels or Beacon information (for more information on how to manage cookie preferences please see our Cookie Policy);
7. The website address from which you accessed our website;
8. Voice recordings of calls you make to our customer service centre, if applicable;
9. Personal information within correspondence you send to us, to the extent it is necessary to process the request contained therein; and
10. Personal information that you have expressly consented to provide us and that we lawfully received from you and/or a third party(ies) according to the applicable laws.

#### **HOW DO WE USE THIS INFORMATION?**

*Gates will only process information that is necessary for the purpose for which it has been collected and in compliance with applicable laws. We will never send you unsolicited 'junk' email or communications, or, to the best of our knowledge, share your personal information with anyone else who might.*

There are various ways in which we may use or process your personal information described above. We list these below:

1. We may use and process your personal information where this is necessary to perform and comply with a contract entered into with you and to fulfill and complete your orders, purchases and/or other transactions entered into with us (or one of our authorised distributors or selected partners).

In case that you do not provide us with your personal information for the said purposes, we may not be able to perform or comply with our contractual obligations under the contract entered into with you, and/or may not be able to fulfill and complete your orders, purchases and other transactions entered into with us (or one of our authorised distributors or selected partners).

2. Where you have provided your prior, express and informed consent, we may use and process your personal information for the purposes mentioned below. Please note that it is not always mandatory for you to provide your personal information;. however not doing so may affect or limit the way in which we provide our services to the extent we may, occasionally, not be able to provide the services at all:



- 2.1. Contact you from time to time about promotions, events, products, services or information which we think may be of interest to you (don't worry, we won't bombard you);
- 2.2. The placement of non-essential cookies when you visit our website (see Cookie Policy for more information).

Please note that not providing consent may affect your experience while navigating our website or using our services. However, it is not mandatory for you to provide consent for the purposes mentioned above and not providing the same will not have negative consequences. You can withdraw your consent at any time by contacting us on the details provided within the "How can I manage the information we hold about you" section below or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

- 2.3. Support you with sales and other enquires you may have, including (i) respond to correspondence you send to us and fulfill the requests you make to us (for example: service requests, brochure requests or information about specific products); (ii) analyse, evaluate and improve our products and services so that your visit and use of our website, applications, customer service centre and authorised distribution network are more useful and enjoyable (we will generally aggregate data so that it doesn't identify you personally); and to provide service, maintenance and warranty information and reminders; (iii) undertake market analyses and research (including contacting you with customer surveys) so that we can better understand you as a customer and provide tailored offers, products and services in which we think you will be interested (with your consent); and (iv) product development purposes (for example, to improve product quality, performance and safety).
- 2.4. To promote our business, brands and products and measure the reach and effectiveness of our campaigns, including (i) to contact our existing clients with marketing information (respecting their opt-out right). In relation to any such information we send by email or SMS, we will include an option allowing you to object to receiving future messages by unsubscribing; (ii) identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information); (ii) to administer competitions and promotions that we may, at our entire discretion, make available -and you voluntarily enter with us from time to time- and to



distribute prizes; (iii) verify the accuracy of your information to better understand you as a customer;

3. To comply with legal obligations, including (i) network and information security purposes (in order for us to take steps to protect your information against loss, damage, theft or unauthorised access); (ii) contact you and comply with a request from you in connection with the exercise of your rights (for example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request); and (iii) contact you with regards to updates to our terms and conditions, this Policy and other policies.

Sometimes we will also need to process your personal information to contact you if there is an urgent safety or product recall notice and we need to tell you about it. In that event, we will use your personal information obtained to notify you of the new purpose and will obtain prior consent from you, if so required by the applicable laws.

#### **HOW DO WE SHARE THIS INFORMATION?**

*We do not sell your information to third parties, but we do work closely with our authorised distribution network and with third party suppliers who fulfill business activities for us (e.g. marketing, events and market research, etc.).*

We may share your personal information with other Gates entities. We may also engage subcontractors (“processors”), who will only process your personal information as per our instructions for one or more of the purposes mentioned in this Policy. We will always make sure that contractual safeguards are in place.

Gates is part of a larger group of companies operating internationally, which has subsidiaries or affiliated companies located in many countries. In this regard, we may transfer your personal data outside of Argentina to other Gates related companies which may be located in countries such as the United States or Brazil which do not offer adequate or similar levels of data protection as those offered by the applicable laws of Argentina. Also, to provide the services and to the extent of the purposes of which we have informed you in this Policy, we may hire processors or contractors that are located in such other countries. Occasionally, we may have to share information to comply with legal obligations or at authorities’ request, all in compliance with the applicable laws of Argentina.

When we need to transfer your personal information outside of Argentina to other countries, we will make sure that the appropriate safeguards, in compliance with applicable laws, are taken to guarantee an adequate level of data protection.



If you want more information on those appropriate safeguards, you can send an email to [privacy@gates.com](mailto:privacy@gates.com).

#### **HOW LONG DO WE KEEP YOUR INFORMATION?**

*We will not hold your personal information in an identifiable format for any longer than is necessary for the purposes which motivated its collection or to comply with our legal obligations, as the case may be.*

In case you have any further questions on the data retention periods relevant for your personal information, you can always contact us at: [privacy@gates.com](mailto:privacy@gates.com).

#### **HOW CAN YOU MANAGE THE INFORMATION WE HOLD ABOUT YOU?**

Under applicable law, you have the right to access your personal information and to request the rectification, update or erasure of your personal data, and that your data be kept confidential.

Also, you have the right to withdraw consent you have previously given us, with no retroactive effects; opt-out from marketing communications; and request an explanation of the applied logic of decisions based solely on automated data processing when these produce harmful legal effects or affect you in a significantly negative way.

To exercise your rights, we will first ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Upon our receipt of your request to exercise your rights, we will consider your request and respond to you within the time specified by applicable laws. Please note that in some cases we may not proceed as requested by virtue of a legal obligation with which we must comply or because, for example, doing so would affect third parties' legitimate interests.

**You can exercise the above rights and/or manage your information by contacting us via [privacy@gates.com](mailto:privacy@gates.com) or via post at:**

**Gates Argentina S.A.**  
Bartolomé Cruz 1810,  
Province of Buenos Aires, Argentina  
Email address: [privacy@gates.com](mailto:privacy@gates.com)

You have the right to file a complaint with the data protection authority in Argentina, as follows: THE PUBLIC INFORMATION ACCESS AGENCY, in its capacity as the Control Entity of Law No. 25,326, has the power to attend complaints and claims filed by those whose rights are affected due to breaches with applicable regulations on personal data protection. More information at: <https://www.argentina.gob.ar/aaip/tramites>.