



## ***Gates China Privacy Policy***

### **POLICY STATEMENT**

This Policy applies to the following Gates entities (collectively, “Gates”, “we”, “us” or “our”):

- Gates Trading (Shanghai) Co., Ltd., with registered office at 1346 No.55 Xili Road, China (Shanghai) Pilot Free Trade Zone, Shanghai, China.
- Gates Unitta Power Transmission (Shanghai) Limited, with registered office at Apartment A, No.233 HuaShen Road, China (Shanghai) Pilot Free Trade Zone, Shanghai, China.
- Gates Unitta Power Transmission (Suzhou) Limited, with registered office at No.15 HaiTang Street, Suzhou Industrial Park, Suzhou, China.
- Gates Auto Parts (Suzhou) Co., Ltd, with registered office at No.155 QianRen Street, Weiting Town, Suzhou Industrial Park, Suzhou, China.
- Gates Fluid Power Technologies (Changzhou) Co., Ltd., with registered office at No. 11 Kohler Road, Changzhou National Hi-tech District, Jiangsu Province, Changzhou, China.
- Gates Winhere Automotive Pump Products (Yantai) Co. Ltd., with registered office at No.51 Jialingjiang Road, Yantai Economic and Technological Development Zone, Shandong, China.

Gates is committed to protecting and respecting any personal information you share with us. Gates will be acting as a "data controller" for the processing activities described in this Policy, which means that we define the purposes and the means for these processing activities.

This Policy describes what types of information we collect from you, how it is used by us, how we share it with others, how you can manage the information we hold, and how you can contact us. This Policy may be supplemented by Privacy Statements for certain websites and applications and you should refer to those statements for additional information.

If you do not agree to the processing of your personal information in the way this Policy describes, please do not provide your personal information when requested and stop using Gates websites. By continuing to use Gates websites you are acknowledging our rules regarding your personal information as described in this Policy.

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 share your personal information 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 to notify you of any substantial changes.

This version of our Policy is effective as of November 1, 2021.

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

*We collect information about you when you engage with our website, applications 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, 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 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 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; and
9. Any information within correspondence you send to us.

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

*Gates will only process information that is necessary for the purpose for which it has been collected. You will always have the option to choose not to receive marketing communications from us (and you can withdraw any previous consent or object at any time). We will never send you unsolicited 'junk' email or communications, or share your personal information with anyone else who might.*

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



### **Contractual performance**

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

### **Consent**

Where you have provided your consent, we may use and process your information to:

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. The placement of non-essential cookies when you visit our website (see Cookie Policy for more information).

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.

### **Expanded services for which we use your personal information**

We may use and process your personal information as set out below where it is necessary for us to provide expanded services for you.

*Processing necessary for us to support customers with sales and other enquiries:*

1. To 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, job applications);
2. To 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 use data amalgamated from many people so that it doesn't identify you personally); and to provide service, maintenance and warranty information and reminders, unless you object;
3. To 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. We will only send



marketing communications to you if you have provided your consent for us to do so or if a legal exemption applies; and

4. For product development purposes (for example, to improve product quality, performance and safety).

*Processing necessary for us to promote our business, brands and products and measure the reach and effectiveness of our campaigns:*

5. To contact our existing clients from time to time with marketing information (unless you object). 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;
6. To identify and record when you have received, opened or engaged with our website or electronic communications (please see our Cookie Policy for more information);
7. To administer competitions and promotions that you enter with us from time to time and to distribute prizes;
8. To verify the accuracy of information that we hold about you and create a better understanding of you as a customer.

If you object to our use of your personal information for expanded services above, you may not be able to use the relevant expanded services, but you can continue to use the basic functions of our websites.

### **Legal obligation**

We may process your personal information to comply with our legal requirements. For instance,

- For network and information security purposes, as applicable laws require us to take steps to protect your information against loss, damage, theft or unauthorised access;
- To 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
- To inform you of updates to our terms and conditions and policies.

### **Vital interest**

Sometimes we will 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.



## **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. A list of Gates entities can be found at <https://www.gates.com>. 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. If we need to transfer your personal information outside of the PRC, we will make sure appropriate safeguards are taken to guarantee an adequate level of data protection and that data processing/transferring agreements are signed with the data recipients if required by laws. If you want more information on those appropriate safeguards (or you want a copy thereof), you can send an email to [privacy@gates.com](mailto:privacy@gates.com).

Your personal information may be transferred to regulatory, enforcement bodies or courts as required by applicable law or regulations or at their request, subject to applicable law. In addition, your personal information may also be transferred to another business entity in connection with the sale, assignment, merger, or other transfer of all or a portion of our business to that business entity.

## **CHILDREN**

We do not knowingly solicit personal information from or market to children under the age of 14. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact us at: [privacy@gates.com](mailto:privacy@gates.com). We will delete such information from our files within a reasonable time.

## **HOW DO WE PROTECT YOUR INFORMATION?**

Gates has taken measures to secure its IT systems against unauthorized access. Only authorized persons have access to your information, based on a personal login and password and only via a secure internet or intranet connection. Access to personal information by an authorized person is permitted only to the extent relevant in the context of that authorized person’s specific assignment.

In addition, Gates has implemented appropriate technical, physical and organizational measures to protect your information against unauthorized or unintentional removal, modification or disclosure and against misuse, damage and theft.

Gates has procedures in place to address suspected data security breaches and will notify you or any applicable regulator of any breach if we are legally required to do so.



For more information on these measures, please contact us via [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. If you are a customer or otherwise have a relationship with us, we will hold personal information about you for a longer period than if we have obtained your details in connection with a prospective relationship.*

Gates has published a data retention and data retention schedules policy. 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?**

*You have the right as an individual to access your personal information we hold about you and make corrections, if necessary. You also have the right to withdraw any consent you have previously given us and ask us to erase information we hold about you. You can also object to us using your personal information (where we rely on our business interests to process and use your personal information).*

You have a number of rights in relation to your personal information under data protection law. In relation to most rights, we will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 15 working days after we have received any request (including any identification documents requested). If we do not fulfil your request, we will explain why.

You have the right to:

1. Ask for a copy of the information that we hold about you;
2. Correct and update your information;
3. Withdraw your consent (where we rely on it), however, the withdrawal will not impact any processing before the withdrawal. Please see further [How do we use this information](#) above;
4. Restrict or object to our use of your information provided we do not have any continuing lawful reason to continue to use and process the information;
5. Be informed of the rules about the collection and use of your personal information by us. We are doing so by providing this Policy.



6. Erase your information (or restrict the use of it), provided we do not have any continuing lawful reason to continue to use and process that information; and
7. Transfer your information in a structured data file (in a commonly used and machine readable format), where we rely on your consent to use and process your personal information or need to process it in connection with your contract.

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

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in the PRC.