

PRIVACY STATEMENT FOR GATESCONNECT™

Gates Industrial Europe SARL, a private limited liability company under Luxembourg law, with registered offices at 33, Rue de Gasperich, L-5826 Hesperange, Luxembourg (“we”/“us”), 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 Statement, which means that we define the purposes and the means for these processing activities.

This privacy statement concerns the processing with respect to Gates’ customer order management in GatesConnect™ dedicated for the EMEA region, and explains the reason for the processing, the way we collect, handle and ensure protection of all personal data provided in GatesConnect™, how that information is used and what rights can be exercised in relation to personal data.

The customer shall ensure that its employees, whose data has been made available to us via GatesConnect™, have been informed about this statement.

Gates is committed to respecting privacy regulations and data protection rights. For general information on the processing of personal data by Gates, please first read the Gates Global Internal Privacy Principles and the Gates Industrial Europe SARL Privacy Policy, found here: <https://www.gates.com/gb/en/utility/privacy-policy>.

This privacy statement applies only to GatesConnect™. Where GatesConnect™ contains links to gates.com, a copy of Gates’ Privacy Policy related to its website is available on gates.com.

In these Privacy Statement, “personal data” refers to any information concerning an identified or identifiable natural person (such as employees, contact persons at customers, etc., which are referred to as “data subjects”) or as such term is defined by local applicable law.

What data do we collect and process?

We collect and process the personal data entered by you voluntarily on GatesConnect™ in order to conduct our activities and to engage with you. We only collect information which is necessary, relevant and adequate for the purpose for which you are providing it to us. We collect both personal and non-personal data. The personal data which we may collect is the following:

- all data entered by you during the registration process, such as: name (first and last) of contact persons at the customer company; phone numbers; e-mail; function and title but this is not mandatory; and company details (such as company name, street, postal code, town, country),
- data entered by you when using GatesConnect™,
- information that you give us by communicating with us (by contact form, by e-mail, or otherwise). It includes information you give us or that we obtain when you contact us to make a purchase, report a problem etc.

We do not collect any special categories of personal data (such as health data, racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation).

How do we collect your data?

We collect personal data you voluntarily provide to us when you register for GatesConnect™ account (e.g., account registration, newsletter sign-up, etc.) and when you use GatesConnect™.

Providing your personal data is, in principle, voluntary, but it may be necessary to conclude or perform a contract, to answer an inquiry or to conduct correspondence with you.

How will we use your data?

Gates collects and processes the personal data as described herein for the following purposes:

- for sales and administrative reasons,
- to perform, settle, and/or conclude customer orders and contracts,
- to provide you with our services and manage and administer our relationships with you or the entity/person that you work for,
- to respond to your queries and for the purpose of further contact in those matters,
- to market, advertise and provide you with information about us, our products or our services (if required by law, upon your consent),
- to provide you with Gates' newsletter, upon your prior consent.
- in case you consent to marketing communication, to use your data to approach you by mail or phone with special offers on our products and services related to your product or services,
- to enter into, and to perform, contracts with you or the entity/person that you work for,
- for testing, data analysis, research and statistical purposes. Personal data collected in this context may become part of the GatesConnect™ database with the purpose to centrally gather, evaluate and report data,
- to communicate where there is an urgent safety or product recall notice
- to comply with applicable laws and regulatory obligations, what includes maintaining appropriate records and responding to the public authorities' requests,
- to defend against or to make claims.

This means that, depending on the situation, we may process your personal data:

- based on your consent, where relevant,
- when it is necessary for the performance of a contract or to take steps at your request prior to entering into a contract,
- when it is necessary for compliance with a legal obligation to which we are subject,
- when it is necessary for the purposes of the legitimate interests pursued by us such as the marketing purposes or testing, data analysis, research and statistical purposes; however, such data processing would not be performed if our legitimate interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data.

Marketing

If you consent to marketing communications, we will send you information about products and services of Gates companies that we think you might like. In case you receive Gates marketing, you may always opt out. All our emails will provide a link to edit your preferences or unsubscribe. You have the right at any time to stop us from contacting you for marketing purposes or giving your data to other members of the Gates group or our business partners. If you no longer wish to be contacted for marketing purposes, please let us know via privacy@gates.com.

Who do we share your personal data with?

We may share your personal data, where necessary and legally allowed, in the following situations and in particular to the following recipients:

- between and among Gates' group entities to process orders and requests, and to expand and promote our product and service offerings;
- our service providers – to support our infrastructure environment, local and international providers of telecommunications and networking services, entities engaged in data storage, and supporting us in our advertising activities,
- the relevant authorities, our auditors, legal advisors and other professional advisors, if we are under a legal duty to disclose your personal data in order to comply with any legal obligation.

Depending on the specific situation, and whereas legally possible, the recipients would process the personal data on our behalf (acting as the processors) or would alone determine the purposes and means of the processing of personal data (acting as the independent controllers).

If data transfers take place outside of the European Economic Area, where relevant, Gates takes appropriate steps to ensure the protection of personal data, in particular by an intragroup data transfer agreement.

How do we store your data?

Gates securely stores your data in the Customer Data Cloud. On their website, you can find their security precautions to ensure that your personal data is protected. Your name and email address are replicated and stored in Gates eCommerce Cloud.

Gates will keep your personal data for as long as necessary with regard to the purpose(s) of the processing and in accordance with applicable local law. In addition, Gates will apply adequate security measures to your personal data to protect them against any type of harm, such as unauthorized access or disclosure, loss, theft or damage. The level of security will be adapted to the nature of the processing activities and will be updated as technology evolves.

If you need any further information regarding the security measures Gates uses, please contact us by e-mail at privacy@gates.com, or by mail to the address listed below.

What are your data protection rights?

Gates would like to make sure you are fully aware of all of your data protection rights. Depending on where you are located, you may be entitled to the following:

The right to be informed - You have the right to be informed about the collection and use of your personal data by Gates. We are doing so by providing this Statement.

The right to access – You have the right to request Gates to provide copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that Gates correct any information you believe is inaccurate. You also have the right to request Gates to complete the information you believe is incomplete.

The right to erasure – You have the right to request that Gates erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that Gates restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to Gates processing your personal data, under certain conditions.

The right to data portability – You have the right to request that Gates transfer the data that we have collected to another organization, or directly to you, under certain conditions.

The right to request information about any **data sharing** operations.

The right to be informed about the consequences of **denying consent** if and when we ask for your consent.

The right to **revoke any consent** you may have given us (without affecting the lawfulness of processing based on consent before its withdrawal).

The right to file a complaint: you can file a complaint before the relevant data protection authority or supervisory authority in your country.

If you make a data subject request, Gates will respond to you within a reasonable time frame and under the deadlines established by applicable law (e.g., for those in GDPR countries, one month after the receipt of a complete, verified request).

Customers can access, change or update their information directly in GatesConnect™ or by contacting Customer Service or other Gates point of contact.

If you would like to exercise any of these rights or in case you have any question about this Statement, please contact Gates at privacy@gates.com or by mail at:

Data Privacy Team
Gates Industrial Europe SARL
33, Rue de Gasperich
L-5826 Hesperange
Luxembourg

Specifically for Gates' German entities, we have appointed a Data Protection Officer, to be contacted via DPO-Gates@data-elements.de.

Gates keeps our privacy policies and statements under regular review and places any updates on its website.