

## **Privacy Notice for Customers, Suppliers, and other Third Party Providers**

Version: May 1, 2018

### **1. INTRODUCTION**

This Privacy Notice for Customer, Suppliers, and other Third Party Providers (“Privacy Notice”) applies to customers, suppliers, advisors, consultants, professionals, and any other third party that IAC conducts business with, and sets forth the policy of International Automotive Components Group S.A. (together with its subsidiaries, “IAC”) concerning the Personal Data IAC collects, how the IAC Processes your Personal Data, with whom IAC shares such data, and how you can contact IAC, access your Personal Data and exercise your other rights in respect of your Personal Data. This Privacy Notice also describes the security measures IAC employs to protect your data.

### **2. DEFINITIONS**

“Controller” as used herein means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data; where the purposes and means of such Processing are determined by Union or Member State law, the Controller or the specific criteria for its nomination may be provided for by Union or Member State law.

“Personal Data” as used herein means 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.

“Process” or “Processing” means any operation or set of operations performed upon Personal Data, whether or not by automatic means, including collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction of Personal Data.

### **3. THE CONTROLLER OF YOUR PERSONAL DATA**

Whenever an affiliate of IAC Processes your Personal Data for its own purposes, that affiliate is considered a Controller of the Personal Data and therefore, is primarily responsible for meeting the requirements of applicable data protection laws.

Unless informed otherwise at the time when your Personal Data is collected, the IAC affiliates that Process your Personal Data and manage your account will operate as Controllers (“Company”).

You will find a list of our affiliates and the respective Company contact information at <http://www.iacgroup.com/about-iac/locations/>.

#### **4. COLLECTION OF PERSONAL DATA**

The Company collects from you certain Personal Data related to you. This includes personal and business contact information, such as your name, address, title, facsimile number, telephone numbers and email addresses as well as other Personal Data as set out in Annex 1 to this Privacy Notice.

You will be informed what Personal Data is contractually required and what Personal Data you may optionally supply when you enter into a contractual arrangement with the Company. Please note that should you decide not to provide your Personal Data it may impact our ability to provide services to you or conduct business with you.

#### **5. PURPOSES AND USE**

The Company Processes your Personal Data in order to administer and manage our relationship with you, as well as to evaluate, review, approve, or enter into potential contractual arrangements with you and verify the correct execution of them. The Company also may Process your Personal Data to comply with certain obligations under the law, industry guidelines and internal policies.

Additionally, the Company will Process your Personal Data to keep you informed about our activities, products and services we think may be of interest to you, as permitted by the applicable law or with your consent, where required. The purposes of the collection, Processing and use are set out in detail in Annex 1 to this Privacy Notice.

#### **6. DATA DISCLOSURE PRACTICES**

Your Personal Data may be Processed on our behalf by, or shared with Company's affiliates and their respective agents, suppliers, vendors, business partners, regulatory agencies that are located in the United States and in other countries inside and outside the EEA for the purposes outlined in the Notice. The Company ensures that these third parties take appropriate technical and organizational measures to ensure an adequate level of data protection, in compliance with applicable legislation. For data transfers to Company's affiliates outside the EEA, an adequate level of data protection is currently safeguarded through Standard Contractual Clauses. A list of our affiliates is available at <http://www.iacgroup.com/about-iac/locations/>.

The list of third-party providers with whom your Personal Data is currently shared includes the following: cloud-based and other software and service providers for hosting and maintenance as well as management of customer and enterprise relationships, engineering and IT service providers, warranty and adverse incidents, expense reports, payment processing, travel and related arrangements, business ratings agencies, accounting and other professional advisors, bankers, lenders, and attorneys, among other legitimate activities and services.

The transfers of Personal Data to third-party providers are secured by implementing the safeguards required under the applicable law (including contractual arrangements entered into with third-party providers). For data transfers outside the EEA, the Company has implemented EU Standard Contractual Clauses to safeguard your Personal Data. In certain exceptional cases, the

Company also will rely on your consent for transferring your Personal Data to a third-party provider outside of the EEA.

If you wish to obtain a copy of the relevant EU Standard Contractual Clauses with commercial terms redacted, please contact us using the information provided below under “Contact Us.”

The Company does not sell or otherwise disclose your Personal Data, except as otherwise described in this Privacy Notice.

## **7. SAFEGUARDING PERSONAL DATA**

We are committed to maintaining the security of your Personal Data submitted online and offline. The Company maintains appropriate physical, procedural, organizational and technical security measures intended to prevent loss, misuse, unauthorized access, disclosure, or modification of your Personal Data under the Company’s control. If you have reason to believe that your Personal Data is no longer secure, please notify the Company immediately using the information provided below under “Contact Us.”

## **8. DISPOSAL AND RETENTION OF PERSONAL DATA**

The Company retains your Personal Data for a period consistent with the Company’s Records Management Policy, not longer than it is allowed under the applicable data protection laws and no longer than such Personal Data is necessary for the purpose for which it was collected or otherwise Processed, unless a longer retention period is required by applicable law, e.g. due to statutory data retention obligations under tax or commercial law.

The Company will keep Personal Data provided for direct marketing purposes until you notify us that you no longer wish to receive marketing information.

IAC’s destroys Personal Data stored on electronic media, such as hard drives, compact disks, and back-up tapes in a manner that will render the information irretrievable, consistent with the Company’s information security policies.

## **9. DATA PROTECTION RIGHTS**

To the extent required by applicable law, you are entitled to obtain information on the Processing of your Personal Data, to object to Processing of your Personal Data, make use of your right to data portability and to have your Personal Data rectified or deleted or their Processing restricted. You also are entitled to withdraw any consent that you might have given with respect to the Processing of your Personal Data at any time with future effect, including any consent for any direct marketing purposes. These are known as “Data Subject Rights.” If you would like to exercise your Data Subject Rights, please contact us using the information provided below under “Contact Us.”

The Company will respond to your request(s) without undue delay within the legally required period of time. To help protect your privacy, the Company takes reasonable steps to verify your identity before granting access to your Personal Data or responding to your requests.

If you are not satisfied with our response or believe that we are not Processing your Personal Data in accordance with the law, you also may contact or lodge a complaint with the competent supervisory authority or seek other remedies under applicable law.

#### **10. CHANGES TO THIS PRIVACY NOTICE**

The Company, in its sole and absolute discretion, may amend, modify, update or change this Privacy Notice or any part of it from time to time without prior notice. The Company encourages you to review this Privacy Notice periodically for changes. You may at any time contact us to request a copy of any, including the most recent version of this Privacy Notice.

#### **11. CONTACT US**

If you have any questions about this Privacy Notice, the Company's Processing of your Personal Data, or to make use of your rights as outlined above, please contact the Company's Data Privacy Coordinator at: [IACdataprivacy@iacgroup.com](mailto:IACdataprivacy@iacgroup.com).

A link to the IAC entity acting as a Controller can be found at <http://www.iacgroup.com/about-iac/locations/>.

## Annex 1

Depending on your relationship with IAC, not all of the below-listed data transfers will be applicable to you. If in doubt, contact the the Company's Data Privacy Coordinator at: [IACdataprivacy@iacgroup.com](mailto:IACdataprivacy@iacgroup.com).

<b>Customer Data Processing</b>	
<b>Purposes of the Transfer</b>	
All IAC Services/Departments	<ul style="list-style-type: none"> <li>• Customer relationship management, publications, newsletters, responses to marketing campaigns, reference customer list, key customer names, warranty claims</li> <li>• International customer training</li> <li>• Sales and service reporting and analysis</li> <li>• Delivery management (to track the shipping of products to customers)</li> <li>• Export control</li> <li>• Product, quality, and technical inquiries (e.g. via "Contact us" form on website)</li> <li>• Access to Customer Support platforms</li> </ul>
<b>Categories of Data</b>	
All IAC Services/Departments	<ul style="list-style-type: none"> <li>• Contact details of contact person, name, title, email address, physical address, phone number, facsimile number, tax ID, and information provided by customers to account managers, product support, quality support, or other IAC contacts.</li> </ul>

<b>Data Processing for Suppliers, Advisors, Consultants, and Other Third Parties</b>	
<b>Purposes of the Transfer</b>	
Suppliers, Advisers, Consultants, and Other Third Parties	<ul style="list-style-type: none"> <li>• Contract management and performance</li> </ul>
<b>Categories of Data</b>	
Suppliers	<ul style="list-style-type: none"> <li>• Contact details of contact person, name, title, email address, physical address, phone number, facsimile number, tax ID, information provided to buyers, account managers, or other IAC contacts, and gender, ethnicity, or disadvantaged ownership status</li> </ul>
Advisers, Consultants and Other Third Parties	<ul style="list-style-type: none"> <li>• Contact details of contact person, name, title, email address, physical address, phone number, facsimile number, credit card information, job title, job description, work location(s), contact</li> </ul>

	<p>history, education, qualifications, information contained in the data subject's curriculum vitae, country of birth or origin, citizenship, gender, nationality, national identification number or other equivalent, internal identifiers, government issued identifiers, compensation information, expenses, bank account and related payment details, performance assessments, information relating to working hours, overtime and attendance records, contract details, tax ID, information provided to any IAC contact, and gender, ethnicity, or disadvantaged ownership status</p>
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