



## Privacy Policy

We are committed to protecting and respecting your privacy.

Everyone has rights with regard to the way in which their personal data is handled.

This Privacy Policy applies to E x H, Inc. This Privacy Policy does not apply to the websites, or any embedded content of any of our business partners or to any other third parties, even if their websites are linked to our website, or contain their embedded content. We recommend you review the privacy policies/statements of the other parties with which you interact.

This Privacy Policy applies to the collection, storage and processing by us of personal data about our customers, suppliers, online users (“you”), and other third parties, and we recognize that the correct and lawful treatment of this data will maintain confidence in the organization and will provide for successful business operations.

This policy sets out the basis on which personal data that we collect from you, or that is provided to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### Data protection principles

When processing your information, we comply with the six enforceable principles of good practice. These provide that your personal data must be:

- processed lawfully, fairly, and in a transparent manner;
- processed for specified, explicit, and legitimate purposes;
- adequate, relevant, and limited to what is necessary;
- accurate and kept up to date;
- kept for no longer than is necessary, and
- processed in a manner that ensures appropriate security.

### Information about you that we collect and process

We can collect and process information about you (such as your name, address, email address, phone number, etc., plus information such as username, IP address and similar fields recorded in security and access logs when accessing the Company’s websites) when you:

- fill in forms or use the functions and services on our websites;
- enter into a contract with us (e.g., by means of our sales representatives, through service agreements, as a supplier, or a business partner, etc.);
- access our premises;
- use our IT resources and communication systems (e.g., email, network, Wi-Fi, etc.);
- correspond with us by phone, email, letters or otherwise;
- apply to work for us;



- purchase products from us, or send us products for repair, or
- subscribe to any of our services or communication channels, including social media.

We may use the information you give to us for a number of different purposes. For each purpose, we are required to confirm the ‘legal basis’ that allows us to use your information, as follows:

<b>Purposes for which we will use the information about you</b>	<b>Legal basis</b>
To store your personal data in our Enterprise Resource Planning systems, for warehouse, accounting, sales, service, and purchase management purposes	It will be necessary for the performance of the contract between you and us.
To store your personal data in databases linked to public-facing websites, for customer service, online ordering of products, and customer relationship management	It will be necessary for the performance of the contract between you and us, and for our legitimate business interests, namely the correct management of the business relationship with our customers, as well as internal administrative purposes.
To store your personal data in our systems (including emails) and file shares for customer relationship, business contact, or supplier relationship management	It will be necessary for the performance of the contract between you and us, and for our legitimate business interests, namely the correct management of the business relationship with our customers and suppliers, as well as internal administrative purposes.
To collect, store and use shipping information (including their communication to shippers and freight forwarders)	It will be necessary for the performance of the contract between you and us, and for our legitimate business interests, namely internal administrative purposes.
To screen your personal data against denied parties' lists/systems for controlling the access to our premises	It will be necessary for our legitimate business interests, namely the interest of preventing fraud and/or illicit behaviors and/or unlawful accesses as well as protecting our assets and premises.
To screen your personal and shipping data against denied parties' lists/systems for carrying out import/export controls	It will be necessary for our legitimate business interests, namely the interest of preventing fraud, crimes and/or unlawful behaviors, and for complying with a legal obligation to which we are subject under U.S. law.



To screen your personal data against denied parties' lists/systems for processing employment applications, or in the context of acting as a sales consultant, distributor or other representative of the Company	It will be necessary for our legitimate business interests, namely the interest of preventing fraud, crimes and/or unlawful behaviors, and for complying with a legal obligation to which we are subject under U.S. law.
To store your personal data in our Active Directory systems for server, user, domain, or access management	It will be necessary for our legitimate business interests, namely for the purposes of ensuring network and information security.

As stated in the table above, most of the collection and processing of your personal information by us is required by a legal obligation or, in the cases listed, it is necessary for the correct execution and management of the contract between you and us. If you do not allow us to collect or process that information, we won't be able to enter into, manage and execute the contract with you.

All other information we collect and process about you, although the collection is not mandatorily required by law or essential for the execution of the contract, is necessary as such information is strictly connected with our legitimate business interests listed above, which do not override your interests or fundamental rights and freedoms. Therefore, if you do not allow us to collect or process that information, we won't be able to enter into, manage and execute the contract with you, or let you access our premises and/or use our IT resources and communication systems.

**Information we collect about you from other sources**

When you visit our website, we may collect information about you such as the Internet Protocol (IP) address used to connect your computer to the Internet, your username, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Additionally, through the use of tracking cookies, some of our websites may ask to collect additional information in order to further enhance your experience.

We may use the information we collect about you for a number of different purposes. For each purpose, we are required to confirm the 'legal basis' that allows us to use your information, as follows:

<b>Purposes for which we will process the information</b>	<b>Legal basis for the processing</b>
To administer our websites and for internal operations, including troubleshooting, data analysis, testing, research, and statistical purposes	It will be necessary for providing you with the services expressly requested (e.g., browse the sites and use their functions) and for our legitimate business interests, namely for the purposes of statistics and for ensuring network and information security.



<p>To ensure you receive the best experience possible when accessing and using our websites, measure or understand the effectiveness of advertising we serve to you, and to deliver relevant advertising to you via third-party analytics and/or profiling cookies</p>	<p>We will only do this if you give us your consent by some specific, informed, and unambiguous method (e.g., when you click on the “OK” or “Accept” button on a displayed cookie consent banner/pop-up).</p>
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You can change the settings on your Internet browser to restrict the amount of information that we can collect when you visit our website. If you do not allow us to collect this information, then we may be unable to offer you the best experience possible when accessing and using our websites.

**Disclosure of your information**

You acknowledge that we have the right to share your personal information with:

- Competent authorities and regulatory bodies to which we are, or may be, subject;
- our auditors and quality assurance assessors;
- online cloud providers;
- selected third parties, including:
  - suppliers and subcontractors to the extent we reasonably consider that it is in our legitimate business interests and necessary to provide services to you; and
  - analytics and search engine providers that assist us in the improvement and optimization of our sites.

We may disclose your personal information to third parties in the follow situations:

- in the event that we enter into negotiations to sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets;
- if the Company or substantially all of its assets are acquired by a third party, in which case personal data held by it about you will be one of the assets transferred to the third party; or
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any contract between you or us, or our website terms of use, or to protect the rights, property, or safety of the Company, our customers, or others.

**Identifying you as a customer**

If you are a business client, we may identify you as a client of the Company in our marketing material or in legal directories, although we will never publicly disclose any confidential information about you without having obtained your prior consent. If you do not agree to us identifying you as a customer of the Company, please notify us by writing to our address (see Contacting Us later in this Policy), or by emailing us at [Contact@exhengineering.com](mailto:Contact@exhengineering.com).



## Where we store your personal data

All information we collect and process about you is stored on our secure servers or hosted in secure cloud-based environments (e.g., AWS).

We will take all steps reasonably necessary to ensure that your data is treated securely, including taking the following safeguards:

- **Entry controls.** This includes physical controls as well as computer security controls related to the access of data and information systems infrastructure.
- **Secure lockable desks and cupboards.** Desks and cupboards are kept locked when not in use if they hold confidential information of any kind.
- **Methods of disposal.** Paper documents are disposed of by shredding in a manner that ensures confidentiality.
- **Equipment.** Our internal policies require that individual computer monitors do not show confidential information to passers-by and that users lock or log off from their computer when it is unattended.
- **Information security.** E x H employs a number of industry-recognized best practices ensuring our systems meet or exceed internationally recognized information security standards including encryption of all data at rest and prohibition on use of outside mobile storage devices.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will use significant measures to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

## How long we will store your personal data

The length of time we will store your data will depend on the 'legal basis' for why we are using that data, as follows:

Legal basis	Length of time
Where we use/store your data because it is necessary for the performance of the contract between you and us	We will use/store your data for as long as it is necessary for the performance of the contract between you and us.
Where we use/store your data because it is necessary for us to comply with a legal obligation to which we are subject	We will use/store your data for as long as it is necessary for us to comply with our legal obligations.
Where we use/store your data because it is necessary for our legitimate business interests	We will use/store your data until you ask us to stop. However, if we can demonstrate the reason why we are using/storing your data overrides your interests, rights and freedoms, then we will continue to use and store your data for as long as it is necessary for the performance of the contract between you and us (or, if earlier,



	we no longer have a legitimate interest in using/storing your data).
Where we use/store your data because you have given us your specific, informed and unambiguous consent	We will use/store your data until you ask us to stop.

## Your rights

You have various legal rights in relation to the information you give us, or which we collect about you, as follows:

- You have a right to access the information we hold about you free of charge, together with various information about why and how we are using your information, to whom we may have disclosed that information, from where we originally obtained the information and for how long we will use your information.
- You have the right to ask us to rectify any information we hold about you that is inaccurate or incomplete.
- You have the right to ask us to erase the information we hold about you (the 'right to be forgotten'). Please note that this right can only be exercised in certain circumstances and, if you ask us to erase your information and we are unable to do so, we will explain why not.
- You have the right to ask us to stop using your information where: (i) the information we hold about you is inaccurate; (ii) we are unlawfully using your information; (iii) we no longer need to use the information; or (iv) we do not have a legitimate reason to use the information. Please note that we may continue to store your information, or use your information for the purpose of legal proceedings or for protecting the rights of any other person.
- You have the right to ask us to transmit the information we hold about you to another person or company in a structured, commonly used and machine-readable format. Please note that this right can only be exercised in certain circumstances and, if you ask us to transmit your information and we are unable to do so, we will explain why not.
- Where we use/store your information because it is necessary for our legitimate business interests, you have the right to object to us using/storing your information. We will stop using/storing your information unless we can demonstrate why we believe we have a legitimate business interest which overrides your interests, rights and freedoms.
- Where we use/store your data because you have given us your specific, informed and unambiguous consent, you have the right to withdraw your consent at any time.
- You have the right to object to us using/storing your information for direct marketing purposes.

If you wish to exercise any of your legal rights, please contact the Company by writing to our address (see Contacting Us later in this Policy), or by emailing us at [Contact@exhengineering.com](mailto:Contact@exhengineering.com).



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You also have the right, at any time, to lodge a complaint with the competent Data Protection Authority if you believe we are not complying with the laws and regulations relating to the use/storage of the information we collect about you.

### **Automated decision-making**

We do not use automated decision-making processes.

### **Changes to our policy**

Any changes we make to our policy in the future will be posted on our website and, where appropriate, notified to you by post or email. Please check our website frequently to see any updates or changes to our policy.

### **Contacting us**

Questions, comments and requests regarding this policy are welcomed and should be addressed to:

E x H, Inc.  
Attn: Privacy - Legal Department  
200 Innovation Boulevard, Suite 205  
State College, PA 16803  
You may also email us at [Contact@exhengineering.com](mailto:Contact@exhengineering.com).