



Gates Industrial Europe SARL Privacy Policy

POLICY STATEMENT

Gates Industrial Europe SARL, a private limited liability company under Luxembourg law, with registered offices at Boulevard d'Avranches 16, 1160 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 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.

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 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 to notify you of any substantial changes.

This version of our Policy is effective as of 25th May 2018.

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.

Legitimate interests

We may use and process your personal information as set out below where it is necessary for us to carry out activities for which it is in our legitimate interests as a business to do so.

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);
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 out 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;
9. For network and information security purposes – i.e., in order for us to take steps to protect your information against loss, damage, theft or unauthorised access;
10. 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
11. To inform you of updates to our terms and conditions and policies.

Legal obligation

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

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 data with other Gates entities. We may also engage subcontractors (“processors”), who will only process your personal data 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 data outside of the European Economic Area, we will make sure the data is only transferred to countries with an adequate level of data protection, or that appropriate safeguards are taken to guarantee an adequate level of data protection. If you want more information on those appropriate safeguards (or you want a copy thereof), you can send an email to 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 data, you can always contact us at: 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 30 days after we have received any request (including any identification documents requested).

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). Please see further [How do we use this information](#) above;
4. Object to our use of your information (where we rely on our legitimate interests to use your personal information) provided we do not have any continuing lawful reason to continue to use and process the information. When we do rely on our legitimate interests to use your personal information for direct marketing, we will always comply with your right to object;
5. 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
6. 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 or via Post at:

Data Privacy Team
Gates Industrial Europe SARL
Boulevard D'Avranches 16
2240 Luxembourg

If you are unhappy, you have the right to lodge a complaint with a data protection regulator in Europe, in particular in a country you work or live or where your legal rights have been infringed. The contact details for the Luxembourg Data Protection Authority are below:

National Commission for Data Protection Luxembourg
(Commission nationale pour la protection des données)
1, avenue du Rock'n'Roll
L-4361 Esch-sur-Alzette
Tel.: (+352) 26 10 60-1

Website: <https://cnpd.public.lu/en/commission-nationale.html>