

PRIVACY STATEMENT

Last Update: May 24, 2018

Protecting the personal privacy of every customer and vendor is a crucial part of gaining and keeping your trust in Timkantech, LLC. (the “Company”, “we”, “us”). As a global organization, we strive to provide a high level of privacy protection across all of our businesses and services and to deploy consistent, rigorous policies and procedures.

This privacy statement (the “Statement”) serves as our commitment to you to protect the security and privacy of your personal data, and covers the following areas of privacy concerns:

1. The types of data we collect from you
2. When we collect your data
3. How we use and process your data
4. Our legal basis for processing your data
5. When and to whom we share your data
6. For how long we retain your data
7. When and to whom we transfer your data across country borders
8. Whether and how we carry out profiling using your data
9. The security measures we take to protect your data
10. Your rights over your data
11. The choices you have over how your data is collected and used by us
12. Who to contact and what to do if you wish to discuss with us about your data and your rights

This Statement does not apply to third-party applications, products, services, websites or social media features that may be accessed through links that we provide on our websites and interfaces. Accessing those links may result in the collection of information about you by a third party. We do not control or endorse those third-party websites or their privacy practices. We encourage you to review the privacy policies of such third parties before interacting with them.

Your privacy is of utmost importance to us in servicing you. Our products and services are rendered to you on the basis of your understanding of your data privacy rights.

Please read this Statement carefully. When visiting our website and using our services that link to or reference this Statement, you agree to be bound by the terms and conditions of this Statement.

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the data alone or in conjunction with any other data in the data controller's possession or likely to come into such possession. The processing of your personal data is governed by applicable privacy laws.

2. What roles do we play in processing your data?

We are the data controller with respect to processing your data (contact details below). This means that we decide how your personal is processed and for what purposes. We know that you care how data about you is used and shared, and we appreciate your trust that we will do so carefully and sensibly.

3. When are your personal data collected?

Some of your data can, in particular, be collected by us:

- whenever you become our customer;
- whenever you register to use our online services (each time you log in or each time you use them);
- whenever you fill in forms and contracts that we send to you;
- whenever you use our services and products;
- whenever you opt-in to our online or offline marketing measures and activities, including but not limited to: newsletters, online and live event registrations, and other promotional information and materials;
- whenever you contact us via the various channels we offer you;
- whenever you are filmed by our surveillance cameras located in or near our premises. These images are recorded solely for the purpose of protecting property and people's safety, and for preventing abuse, fraud or other criminal activities from which our customers and ourselves could also become victims.

4. Our collection of personal data

The personal data we collect include any and all data you provide to us when you enter into contract with us, register an account with us enter on our website, provide us information on a web form, update or add information to your account, or give us in any other way. You can choose not to provide data to us, but we may

then not be able to service you where such services require processing such data. We use the data that you provide for purposes administering your use of our services, such as communicating with you, responding to your requests, managing your account, customizing your service experience with us, improving our products and services, and personalizing marketing measures and activities. We may communicate with you by mail, email or telephone. We will send you strictly service-related announcements or information on rare occasions when it is necessary to do so.

Examples of the data we collect and store include: your e-mail address, name, address, phone number, login, account name, account number, password, your account activity, files accessed or used by you, transaction data and any information you provide during a transaction, or other transaction-based content that you generate or connected to your account as a result of your transaction, financial data such as bank accounts and credit card numbers, logistics and billing data (such as customs ID and tracking number), your chat and service history with us, and any other information you may provide us such as your age, gender, interests, and preferences.

We also receive and store certain types of data whenever you interact with us. For example, we use "cookies," which are unique identifiers that we transfer to your device to enable our systems to provide features of our services such as personalized advertisements on other websites, provide remote access for you, allow you to visit our website without re-entering your username and/or password, verify that you have the authorization needed for the services to process your requests, personalize and improve your experience, record your preferences, customize functionalities for your devices, and to improve the functionality and user-friendliness of our services. It also helps us to better understand how you interact with our services and to monitor aggregate usage and web traffic routing on our website. Most of the cookies used by us are so-called "session cookies." Cookies do not cause any damage on your computer and do not contain any viruses. Most browsers automatically accept cookies as the default setting. You can modify your browser setting by editing your browser options to reject our cookies or to prompt you before accepting a cookie. However, if a browser does not accept cookies or if you reject a cookie, some portions of our services may not function properly.

We obtain certain types of data when your web browser accesses our website or advertisements and other content served by us or on our behalf on other websites, such as the Internet protocol (IP) address used to connect your computer to the Internet, device ID or token, unique identifier, device type, ID for advertising, referral URL, computer and connection data such as the type of operating system you use, your device information, your software information, browser type, browser language and version, ad data, access times, your browsing history, and your web log information. Our website automatically receives and records your IP address that your browser sent us on our server when you log in to our website. We will store your IP address in our user registration databases. We will use your IP address for the following purposes:

- send the most appropriate banners based on geographic area or information derived from your IP address.

- estimate the total number of visitors from specific countries or regions all over the world.
- help to identify customers.

We may also receive data about your location and your mobile device when you download our apps. This includes a unique identifier for your device. We may use this data to provide you with location-based services, such as advertising, search results, and other personalized content. You can turn off location services on your device.

Our website keeps your account information active in our user registration databases in order to provide immediate access to your personal data each time you visit our website, as noted above.

All the data we collect from you may be stored as log files in our server or as augmented information associated with you or your devices. These log files are used for analysis, research, auditing, and other purposes. Your data is stored in log files until the data is transferred to backup databases. We routinely back up a copy of your data to prevent loss of your data in case of a server breakdown or human error. However, all such copies of your data in our backup database will be retained only for as long as our data retention policy permits (see “How long do we keep your personal data?” below), and will in any case be deleted immediately upon your request.

5. Use of Cookies

Our website uses analytics tools such as cookies to analyze how you use our website, and to monitor and analyze the use of our services. The information generated by cookies about your use of the website will be transmitted to and stored by various cookies providers (“Cookies Providers”). Cookies Providers will use such information on our behalf for the purpose of evaluating your use of the website, compiling reports on website activity, and providing us other services relating to website activity and internet usage.

We use both first-party and third-party cookies on our website. First-party cookies are cookies issued from our domain that are generally used to identify language and location preferences or render basic site functionality. Third-party cookies belong to and are managed by other parties. These cookies may be required to render certain forms, or to allow for some advertising outside of our website.

You may refuse the use of cookies by selecting the appropriate settings on your browser by visiting www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. However, please note that if you do this you may not be able to use the full functionality of this website.

6. Use of Opt-In/Subscribe Personal Data

You have a choice of whether and how you receive a variety of marketing measures and activities from us related to product solutions, services and helpful business content.

You can manage your preferences by:

- Opting-in to newsletter subscription on a web form;
- Opting-in to marketing measures and activities on a web form; or
- Unsubscribing newsletters or opting-out of marketing measures and activities, via a link at the bottom of newsletter or emails regarding marketing measures and activities.

7. How do we process your personal data.

We comply with our obligations under applicable privacy laws by keeping personal data up to date; by storing and destroying it securely; by collecting and retaining only the necessary data that we need to service you; by protecting personal data from loss, misuse, unauthorized access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

The processing operations we perform on your data cover automated and non-automated means of collecting, recording, organizing, structuring, storing, altering, retrieving, using, transmitting, disseminating or otherwise making available, aligning or combining, restricting, and/or erasing your data.

We use your personal data for the following purposes:

- To design and deliver our services and activities to you.
- To operate our website to provide you access to and use of our services.
- To design services and activities, inform you of online and offline offers, products, services, and updates, customize your shopping processes, or share with our business partners, distributors, integrators, and customers.
- To customize, measure, and improve our services and our marketing communication activities based on your background, interests, or service or promotion preferences, where we may create a profile based on such information (see “Profiling” section of this Statement).
- To provide services and products requested by you as described when we collect the information.
- To contact you to conduct research about your opinions of current services and products or of potential new services and products that may be offered by us.
- To send you communications regarding marketing measures and activities or conduct webinars informing you of our news, events, new products, business tools and information, and activities.

- To share your contact details with our affiliate offices around the world within our group of companies, for the purposes of internal administration and back-office support, to ensure our network security, and to prevent fraud.
- To maintain the integrity and safety of our data technology systems that store and process your personal data.
- To provide anonymous reporting for internal and external customers.
- To share your contact details with our logistics partners, distributors, and integrators so that they can assist us to deliver our services and products to you.
- To provide you with location based services (such as advertising, search results, and other personalized content).
- To enforce or defend our policies or contract with you.
- To detect and investigate data breaches, illegal activities, and fraud.

If you wish to subscribe/opt-in to our marketing measures and activities, we will use your name and email address to send the communications to you. Out of respect for your privacy, if you no longer wish to receive these communications from us, please follow the opting-out “unsubscribe” instructions provided in the link at the bottom of our emails regarding marketing measures and activities, or update your account settings.

8.What is our lawful basis for processing your personal data

In general, the lawful basis for us to process your personal data for the various types of processing performed on your data (please refer to “How do we process your personal data?” section of this Statement) is, as applicable, processing based on your consent, as necessary for us to enter into and to perform our contract with you, or as necessary to pursue the legitimate interest of our Company or of third parties.

We will collect, process and use the personal data supplied by you only for the purposes communicated to you and will not disclose your data to third parties except under the circumstances of data disclosure described in the “Sharing your personal data” section below.

Where we talk about our legitimate interest or that of third parties, such legitimate interest can include:

- Implementation and operation of a group-wide organizational structure and group-wide information sharing;
- Right to freedom of expression or information, including in the media and the arts;
- Prevention of fraud, misuse of company IT systems, or money laundering;
- Operation of a whistleblowing scheme;
- Physical security, IT and network security;
- Internal investigations; and

- Proposed mergers and acquisitions

9.Necessity to provide us data

You are not under any obligation to provide us any personal data. As noted below, the choice is yours. However, please note that without certain data from you, we may not be able to undertake some or all of our obligations to you under our service contract with you, or adequately provide you with our full range of services. If you would like to obtain more detail about this, please contact us following the instructions in the “Contact Us” section below.

10.Sharing your personal data

Your personal data will be treated as strictly confidential, and will be shared only with the categories of data recipients listed below. We will only share your data with third parties outside of the Company with your consent, and you will have an opportunity to choose for us not to share your data.

We may disclose your personal data to:

- Our affiliated entities within our global group of companies worldwide to provide you services such as facilitating order processing and shipping, for internal administration purposes, to detect and deal with data breaches, illegal activities, and fraud, and to maintain the integrity of our information technology systems.
- Third-party service providers whom we subcontract to work on our behalf or for us and therefore may have access to your data only for purposes of performing these tasks on our behalf and under obligations similar to those described in this Statement, who perform functions such as data processing, auditing, order fulfillment, managing and enhancing customer data, providing customer service, conducting customer research or satisfaction surveys, logistics support, marketing support, payment processing and invoice collection support, informational systems technical support, to help us provide, analyze, and improve our services such as data storage, maintenance services, database management, web analytics, improvement of our service features, and to assist us in detecting and dealing with data breaches, illegal activities, and fraud.
- Governments and/or government-affiliated institutions, courts, or law enforcement agencies, to comply with our obligations under relevant laws and regulations, enforce or defend our policies or contract with you, respond to claims, or in response to a verified request relating to a government or criminal investigation or suspected fraud or illegal activity that may expose us, you, or any other of our customers to legal liability; provided that, if any law enforcement agency requests your data, we will attempt to redirect the law enforcement agency to request that data directly from you, and in such event, we may provide your basic contact information to the law enforcement agency.

- Third parties involved in a legal proceeding, if they provide us with a court order or substantially similar legal procedure requiring us to do so.

We may provide you with opportunities to connect with third-party applications or services. If you choose to use any such third-party applications or services, we may facilitate sharing of your information with your consent. However, we do not control the applications or services of those third parties or how they use your information, and your use of such applications and services is not governed by this Statement. Please review the terms and the privacy policies of those third parties before using their applications or services.

Most of the advertisements and marketing communications that are sent to your web browser are made by us. However, we also allow other companies, called third-party ad servers or ad networks, to provide advertisements on our website. These companies may also send cookies to your computer. If an advertiser asks our website to show advertisements to certain visitors and you respond to that ad, the network advertiser or ad-server may think of you as the targeted audience they are trying to reach. The personal information you disclose to other parties such as network advertisers, third-party ad servers, or other websites from the Internet is protected by their respective privacy policies. The privacy policies of different network advertisers or third-party ad servers are not bound to this policy, and our website is not responsible for these privacy policies.

We will display your personal data and account activity in your profile page and elsewhere on our service portals according to the preferences you set in your account. You can review and revise your profile information at any time. Please consider carefully what information you disclose in your profile page and your desired level of anonymity. In your profile page, we will also display your device information as well as provide the network connection information for the devices to the applications that connect to your devices. Our services also include sharing and publishing features that by their nature support sharing with users you choose. Those users may see your name, email address, photo and some information from your profile page, and files you choose to share. They may also forward your shared files or published devices to the public. Public information may be broadly and quickly disseminated. Please consider what files you share and devices you publish.

11. How long do we keep your personal data

We keep your personal data for no longer than reasonably necessary for the given purpose for which your data is processed. If you will provide us, or have provided us, consent for us to process your data, we will process your data for no longer than your consent is effective. Notwithstanding the above, we may retain your personal data as required by applicable laws and regulations, as necessary to assist with any government and judicial investigations, to initiate or defend legal claims or for the purpose of civil, criminal or administrative proceedings.

If none of the above grounds for us to keep your data apply, we will delete and dispose of your data in a secure manner according to our data protection policy.

12. Privacy of data subjects under the age of 16

Our products and services are not targeted to persons under the age of 16. We do not knowingly collect or process personal data from persons under the age of 16.

13. Your rights and your personal data

Unless subject to an exemption under applicable privacy laws, you have the following rights with respect to your personal data:

- The right to request a copy of your personal data which we hold about you.
- The right to request that we correct any personal data if it is found to be inaccurate or out of date.
- The right to request to erase your personal data where it is no longer necessary for us to retain such data, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- The right to withdraw your consent to the processing at any time if we rely on your consent to process your data. This includes cases where you wish to opt out from marketing communications that you receive from us. where we rely on your consent to process your data. This includes cases where you wish to opt out from marketing communications that you receive from us.
- The right to request that we provide you with your data and where possible, to transmit that data directly to another data controller, where the processing is based on your consent or is necessary for the performance of a contract with you, and in either case we process the data by automated means.
- The right to restrict our processing of your personal data where you believe such data to be inaccurate, our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- The right to object to us using your personal data, where the legal justification for our processing of your personal data is our legitimate interest. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defense of legal claims.

- The right to lodge a complaint regarding our processing of your data, with the competent authority where you reside or in which your data is processed.

If you would like to exercise any of the above rights, please do so by providing your request to the responsible committee set forth in the “Contact Us” section.

After receiving your request, we will evaluate your request and inform you how we intend to proceed on your request. Under certain circumstances in accordance with applicable privacy laws and regulations, we may withhold access to your data, or decline to modify, erase, port, or restrict the processing of your data.

Please be advised that if you exercise the rights to erase data, restrict or object to our processing, or to withdraw your consent, we may not be able to continue our services to you if the necessary data is missing for processing.

14. Transfer, Storage, and Processing of Data Abroad

As noted in the “Sharing your personal data” section of this Statement, as a globally operating company, we may share your information with our affiliate companies or third parties. Please refer to the “Sharing your personal data” section of this Statement for the recipients of your data and the reasons for our provision of your data to them. Where such entities are located in other countries and jurisdictions, we will therefore be transferring your personal data outside of the European Economic Area. In making such data transfers, we make sure to protect your personal data by applying the level of security required by the applicable privacy laws. Where we transfer your data to a country or jurisdiction that cannot guarantee the required level of protection as required by applicable privacy laws, we have enhanced our IT security measures and have entered into Standard Contractual Clauses with the transferee to require security obligations on the transferee, both of which are intended to increase the protection of your personal data. Standard Contractual Clauses are one of a number of “appropriate safeguards” under the applicable privacy laws that enable the transfer of personal data concerning data subjects within the European Economic Area to jurisdictions that have not been designated by the European Commission as possessing an adequate level of data protection. You may request a copy of such Standard Contractual Clauses from us, or inquire about transfers of your information, by providing your request to the responsible committee set forth in the “Contact Us” section.

15. Profiling

We strive to provide the most relevant and valuable marketing experience for you. Therefore, we collect the basic information you provide to us when you opt into our communications (such as email address, company name, industry, country, etc.) in order to supply you with content that is applicable to your business and job role.

We will also couple that with any inferred data you provide through actions you take when interacting with the content we offer you. For example, if you are interested in specific industry topics, we may offer you more information about such topics the next time we have news to share.

We are mindful of the impact that personalizing your marketing experience can create. Therefore, we apply the following safeguards:

- We have carried out, and will carry out on an annual basis, a Data Protection Impact Assessment to consider and address the impact to you before we conduct any new profiling.
- We collect only the minimum amount of data we need for our profiling purposes.
- To the extent possible, our priority is to use anonymized or pseudonymized data, instead of data that can directly or indirectly identify you, in our profiling activities.
- All such data are secured with the technical measures described in the “Security” section of this Statement.
- We carry out regular checks to ensure that our systems are working as intended.

If you do not agree with our carrying out profiling using your data, please note that you have the right to object to such use of your data, and you can object via submitting your request to the responsible committee set forth in the “Contact Us” section.

16.Further processing

If we wish to use your personal data for a new purpose not covered by this Statement, then we will provide you with a new notice explaining this new use prior to commencing such further processing for a new purpose, setting out the relevant new purpose and processing conditions. In such case, we will find a lawful basis for further processing, and whenever necessary we will seek your prior written consent to such further processing.

17.Security

We protect your data using technical measures to minimize the risks of misuse, unauthorized access, unauthorized disclosure, loss or theft, and loss of access. Some of the safeguards we use are data pseudonymization, data encryption, firewalls, and data access authorization controls. We take our data security very seriously. Therefore, the security mechanisms used to protect your data are checked and updated regularly to provide effective protection against abuse.

The website through which we collect your information are usually encoded, using the encryption module of your browser, and are certified for international encryption technique. If necessary, we use SSL (Secure Socket Layers) encryption to protect your personal information. Moreover, we have put in place additional and

comprehensive state-of-the-art security measures when your data is accessed via the Internet. Firewalls prevent unauthorized access. Diverse encryption and identification layers protect your data from intrusion or disclosure to third parties during data transfer. Furthermore, we internally use sophisticated encoding methods in order to prevent decoding by unauthorized persons. Moreover, an electronic identifier is generated during data transfer to safeguard your information.

For your confidentiality and security, we use a user ID and a password to secure your personal information. It is important for you to protect your ID, password, or any personal information. Do not disclose your personal information (especially password) to anyone. When you are finished using our services, please do not forget to log out from your account. If you share a computer, whether in a public or private setting, be sure to sign off and close your browsers when finished using a shared computer.

Despite our best efforts, however, security cannot be absolutely guaranteed against all threats. If you believe that the security of your data has been compromised, or if you like more information on the measures we use to protect your data, please contact us following the instructions in the “Contact Us” section below.

18.What are your choices?

You have the choice to allow us to collect and process your data. The collection and processing of your personal data is neither a statutory nor a contractual requirement, although as noted above, we will be unable to provide you with certain services without the data necessary for such services purposes.

If you are dealing with us online, note that most browsers will inform you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, and how to disable cookies. Additionally, you can disable or delete data used by browser add-ons, such as Flash cookies, on your browser or on the website of its manufacturer.

You can always choose not to provide your data to us, although we may need such data to process your requests, in which case we will inform you of our constraints.

To the extent that you have consented to our processing of your data, you can choose to discontinue our processing at any time.

You can choose to request from us a copy of the personal data we store and process regarding you.

You can choose to add or update data that you have provided to us.

You can choose to erase your data, or you may choose to restrict our processing of your data instead.

You can choose to port your data to a third party under conditions stated above.

You can choose to object to our processing of your data.

You can choose to not allow us to engage in building a personalized marketing profile based on such profile.

Your choice or request on any aspects of data processing listed above can be communicated to us using the channels set forth in the “Contact Us” section of this Statement.

In summary, what we are allowed to do with your data is, with limited exceptions under applicable privacy laws, up to you. However, in the event that you choose for us not to further process your data, such choice may affect the delivery of our obligations or services to you; in this situation, we will inform you of our constraints.

19. Whom should I contact?

If you have any question about this Statement, or if you would like to exercise any of your rights, or if you have any complaints that you would like to discuss with us,
by e-mail to privacy@timkantech.com

In case of disagreements relating to our processing of your personal data, you can submit a request for mediation or other administrative action to the data protection supervisory authority with the competent authority where you reside or in which your data is processed. Please click here for a list of local data protection authorities in EEA countries: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080.