

Dormer Pramet Privacy Statement

(last updated 23 May 2018)

Dormer Pramet is committed to protecting your privacy

The integrity of your personal data is vital for Dormer Pramet and its group of global subsidiaries (hereinafter referred to as “Dormer Pramet,” as applicable), and therefore, we welcome the extra transparency and protection of your personal data that the General Data Protection Regulation (GDPR) requires.

Whether you are a valued **Customer, Supplier, Commercial** or **Administrative Intermediary**, a **Digital Registrant**, a **Physical Registrant**, a **Digital Visitor** or a **Facility Visitor**, it’s important to us that you feel safe about how we treat your personal data.

Accordingly, we outline below what types of personal data we collect from you, why, and what happens to your data while in our care. We also explain your rights under the GDPR and give you contact details in case you have any questions or requests about your data.

To understand what legal ground we rely on for each of the purposes described below, you are informed at the point of data collection where you will also be referred to this Dormer Pramet Privacy Statement. Regarding retention periods, we store personal data only as long as necessary to fulfil the purposes outlined in this Privacy Statement unless a longer storage period is required for legitimate reasons, required by law or as necessary to justify or defend a legal claim. If you gave your consent for the use of your data, you may withdraw that consent at any time, and we will stop using your data. Your withdrawal of consent rights as well as the specific retention periods are provided to you in the information where we initially collected your personal data.

Definitions

In the table below, we consider you:

- a **Customer** if you or the company you work for has purchased our products or services;
- a **Supplier** if you work for one of our many supplier companies from whom we purchase goods and services;

- a **Commercial or Administrative Intermediary** if you work for one of our many distributors or other intermediaries such as our agents and customs brokers;
- a **Digital Registrant** if you, for example, use our websites to: 1) request information about our products or services; 2) register for newsletters or Dormer Pramet sponsored events; 3) apply to any Dormer Pramet subscriptions or community forums; 3) or respond to survey or marketing communication;
- a **Physical Registrant** if you register with us in person at any of our events;
- a **Digital Visitor** if you navigate our websites without registering as described under Digital Registrant;
- a **Facility Visitor** if you visit any of our offices or facilities in the EU or EEA (European Union and European Economic Area)

Please be aware that you may appear in multiple categories as described above, depending on your relationship and activities with Dormer Pramet. For example, you may be considered a Customer, a Digital Registrant and a Facility Visitor if you purchased our products, filled in one of our web forms and visited a Dormer Pramet site at some point in time.

What types of personal data do we use and why?

		Category of Individual interacting with Dormer Pramet						
Categories of data	Purposes	Customers	Suppliers	Commercial and Administrative Intermediaries	Digital Registrants	Physical Registrants	Digital Visitors	Facility Visitors
Contact data (such as name, business address, email address, and phone number)	Effective and efficient communication: respond to your questions, send information about Dormer Pramet products and services of interest to you; lead generation; fulfil our obligation to keep you informed about safety matters; communicate technical changes	✓	✓	✓	✓	✓	✗	✓

Organizational data (such as which company and department you work in)	Efficient marketing: understand what products and services information you would be interested in receiving	✓	✓	✓	✓	✓	✗	✓
Financial data (such as credit or payment information, bank account details)	Financial control: To assess credit and payment history, facilitate payments; to fulfill anti-money laundering obligations; and to manage rebates and refunds	✓	✓	✓	✗	✗	✗	✗
Contract data (such as sales/purchase orders, shipment address or return to address), billing information, and other information collected under our customer and supplier contracts	Facilitation of order management, shipment and warranty; administration of service level agreements	✓	✓	✓	✗	✗	✗	✗
Video, photo, time and location of recording, car/truck license plate number	Limited cameral surveillance. Cameras are stationed at certain unmanned gates to the industrial areas for the following purposes: <ul style="list-style-type: none"> • Open and close gates safely to prevent damage to vehicles and people; • Control so no unauthorized persons gain access to the industrial area when opening gates. • Monitor exposed areas where there is a risk that unauthorized persons gain access to the industrial area unnoticed; • To prevent and reveal property damages and related crimes; • Investigate incidents and accidents. 	✗	✗	✗	✗	✓	✗	✓
Learning/training records (such as training attendance, completion of learning activities, competence data, qualifications)	Administer the customer/supplier/partner relationship and to communicate and develop new training opportunities you may be interested in	✓	✓	✓	✗	✗	✗	✗
Individual preferences (such as language and food preferences)	Provide effective communication in the language of your choice and cater for dietary requirements. To offer you a pleasant experience in dealing with us	✓	✓	✓	✓	✓	✗	✓
Service and warranty data (such as Repair and service history and claims)	For contract warranty fulfilment and for product development improvements and for fulfilling our/your maintenance obligations	✓	✓	✓	✗	✗	✗	✗
Health and safety data (such as incidences occurring during visits to our test and manufacturing facilities, and any injuries that may occur from use of our equipment)	Fulfill legal obligations to record incidents and claims management. Improve safety in hazardous environments and to facilitate access for individuals with physical restrictions	✓	✓	✓	✗	✗	✗	✓
Travel data (such as visa and passport information, travel costs, itinerary)	Arrangement of travel to Dormer Pramet sites and events, including arrangement of Visas	✓	✓	✓	✗	✗	✗	✓
Information about the event you attended	Follow-up with you about more information regarding the product or service you showed interest in and to send you information about related products and services	✗	✗	✗	✓	✓	✓	✓

Information about where you were on the Internet when you gave us your contact information and the material you downloaded from our website. Information about the Dormer Pramet community blog or chat forums you participated in.	Follow-up with you about information regarding the product or service you showed interest in and to send you related product information	X	X	X	✓	X	X	X
Information about Dormer Pramet newsletters or other Dormer Pramet content related material you have subscribed to	Follow-up with you about more information regarding the product or service you showed interest in and to send you related product information	X	X	X	✓	X	X	X
Navigational data (such as IP address, cookies, session identifiers, browser type, web pages viewed and links clicked).	Operate and improve your overall web-browsing experience. Personalize your browsing experience and to allow us to deliver the type of content and product and service offerings of most interest to you. Allow us to better service you in responding to your customer service requests. Efficiently process your transactions. Administer a promotion, survey or other website feature	X	X	X	✓	X	✓	X
Location, date and time of visit information	Travel and transfer arrangements; welcome messages	X	X	X	X	X	X	✓
License plate number of vehicle	Facilitate and manage parking permits	X	X	X	X	X	X	✓

Attention

If you navigate our websites, you will find specific and applicable Cookie Information for each specific website. This Dormer Pramet Privacy Statement applies solely to the personal data of EU and EEA residents collected by Dormer Pramet.

In an attempt to provide you with increased value, we may include third party links on our websites. These linked sites have separate and independent privacy policies. Dormer Pramet is not responsible for the practices of these third-party websites and so your use of those websites will be in accordance with their privacy policies.

Sharing information with parties outside of Dormer Pramet

Dormer Pramet does not sell, trade, or otherwise transfer your personal data to outside parties except as provided below based on Dormer Pramet's legitimate interests to provide you with the high quality, useful products and services you have come to expect from Dormer Pramet. We may transfer your data outside the EU and EEA only if we have assured an adequate level of protection in the receiving country such as through the Sandvik intra-group data transfer agreement, the European Commission's Standard Contractual Clauses with third parties or as otherwise required under national data protection law.

- We may share data about Digital Visitors, Customers and Registrants to our website hosting partners and other parties who assist us in operating our websites, conducting our business, or servicing you, so long as those parties agree to keep your personal data confidential. More detail about this can be found at our specific Cookie Information pages.
- Dormer Pramet may share data about a Digital Visitor, Facility Visitor, Customer, Registrant, or Supplier with another Dormer Pramet company if necessary to respond to you.
- We may share data about Digital Visitors, Facility Visitors, Customers and Digital or Physical Registrants within the Dormer Pramet group and with Dormer Pramet business partners like authorized resellers or distributors so they can market and sell relevant Dormer Pramet products and services to you, and so that we may jointly host product demonstrations and other events for you.
- We may have to release information about Digital Visitors, Facility Visitors, Customers, Suppliers, or Digital and Physical Registrants to the appropriate authorities or other relevant third parties in order to enforce our privacy policies, or to protect Dormer Pramet's rights, property, or safety. We may also have to release your data to government authorities when a legal obligation compels us to.

Blogs, chat rooms and the like

Dormer Pramet may provide blogs, chat rooms or bulletin boards on our websites. Any personal information you choose to submit in such forum may be read, collected, or used by others who visit these forums. These non-Dormer Pramet third parties may in their own discretion send you unsolicited messages. We are not responsible for these third parties' handling of your personal data.

We post a list of customers' references and testimonials about our products and services only upon consent of each customer.

Your rights

You have the **right** to: (1) know what data Dormer Pramet holds about you; (2) restrict, under certain circumstances, our processing of your data; (3) have access to your data; and (4) have it corrected if inaccurate or out of date. Additionally, you may object, based on your personal circumstances, to our processing of your data for our legitimate interests or object to our decisions about you based on profiling or automated decisions using your personal data. In some cases, you may require us to completely erase your data from all our files, and in other cases you may require us to provide your data in a machine-readable format and have the data transferred to another company. To exercise any of these rights, please visit our [Privacy portal](#).

If we collect personal data based on your consent, you have the right to withdraw your consent at any time. You may exercise this right by clicking on “withdrawing consent” or clicking on the “unsubscribe” link located at the bottom of Dormer Pramet marketing emails or web forms where we obtained your consent.

You have the right to lodge a complaint with the government authority charged with protecting your personal data rights. This could be: 1) the government authority in the country of the Dormer Pramet company that collected your data; or 3) the authority in the country where you believe a violation of your personal data rights occurred.

The Controller of your data

The Controller of your data is the Dormer Pramet group company that initially collected your data and decided the purposes and means for using your data. You may view a list of all of Dormer Pramet and Sandvik Group legal entities [here](#). If you have questions about who the Controller of your data is or any other questions about your data, please complete the [Data subject access request form](#) in the privacy portal

Data collected from other sources

There may be times when Dormer Pramet collects data about you from another source than yourself. This could happen, for example, when our Business Partners or Suppliers provide us with information about you. We also collect personal data from public sources such as social media. We will provide more information about the third party sources in the specific cases where this happens.