

Website Privacy Policy

Version: May 1, 2018

1. INTRODUCTION

This Website Privacy Policy describes the types of information that International Automotive Components Group S.A. (together with its subsidiaries, “IAC”) may collect from you or that you may provide when you visit, and/or use services related to, our website located at <http://www.iacgroup.com> (collectively, the “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Policy does not apply to information collected by us offline or through any other means, including on any other website operated by IAC or a third party or through any application or content (including advertising) that may be linked to or accessible from the Website.

IAC is committed to protecting your privacy. We provide this Privacy Policy to explain the type of we collect and to inform you of the specific practices and guidelines that protect the security and confidentiality of your personal data. Please read this Privacy Policy carefully. If any term in this Privacy Policy is unacceptable to you, please do not use the Website or provide IAC any personal data. This Privacy Policy may change from time to time (see [Revisions to Our Privacy Policy](#)).

2. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, which may include information defined as personal data or personally identifiable information under applicable law (“Personal Data”). For example, we may collect information such as your name, e-mail address, telephone number, address, job title, company/organization name, current supplier status, and information related to inquiries and requests. We also may collect information about the internet connection and equipment you use to access our Website. As you navigate through the Website, we may automatically collect information such as your usage details, IP addresses, and information collected through cookies.

Information You Give to Us. The information we collect on or through our Website may include:

- Information that you provide by filling in forms and applications on our Website including your user name, password, contact information, etc. This includes information necessary to become a supplier and registration forms for obtaining account credentials to access the web-based supplier applications from the Supplier Portal.
- Information provided when you apply for career opportunities through our Website. If you choose to apply online with IAC, our processing of your Personal Data is described in a separate policy.
- Information you provide when signing up for newsletters and other types of informational material; when you inquire about products, technical support, and customer service; and when you provide feedback about our Website.
- Records and copies of your correspondence with us (including e-mail addresses).

If you give us the Personal Data of a third party, you represent that you have provided notice to, and received authorization to provide such information from, that third party.

Information We Collect About You. As with many other websites, as you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including the resources that you access and use on our Website, traffic data, location data, logs, language, date and time of access, frequency, and other communication data.
- Information about your computer and internet connection, including your IP address, operating system, host domain, and browser type.
- Details of referring websites (URL).

The information we collect automatically is statistical data that helps us improve our Website and deliver a better and more personalized service, including by enabling us to:

- Determine Website traffic patterns.
- Count web visits.
- Determine traffic sources so we can measure and improve the performance of our Website.
- Help us to know which pages and content are the most and least popular.

- Observe Website search patterns to provide more intuitive navigation cues.
- Determine the frequency of user visits and last date of visit.
- Monitor, troubleshoot, and administer the Supplier Portal.

3. COOKIES AND OTHER TECHNOLOGIES

Google Analytics. Our Website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses cookies, which are text files placed on your computer, to help the Website analyze how users use the site. The information generated by the cookie about your use of the Website will be transmitted to and stored by Google on servers in the United States.

Google will use this information on behalf of us as the operator of the Website for the purpose of evaluating your use of the Website, compiling reports on Website activity for Website operators and providing them other services relating to Website activity and internet usage.

In case IP anonymization is activated on our Website, your IP address will be truncated within the area of Member States of the European Union or other parties to the Agreement in the European Economic Area. Only in exceptional cases the whole IP address will be first transferred to a Google server in the USA and truncated there. IP anonymization is not currently active on our Website.

The IP address that your browser conveys within the scope of Google Analytics will not be associated with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the Website.

You also can opt-out from being tracked by Google Analytics with effect for the future by downloading and installing Google Analytics Opt-out Browser Add-on for your current web browser: (click here <https://tools.google.com/dlpage/gaoptout?hl=en-GB>).

Cookies Used on This Website. Our Website uses single-session (temporary) and multi-session (persistent) cookies. Temporary cookies last only as long as your web browser is open, and are used for technical purposes such as enabling better navigation on the Website. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes including tracking the number of unique visitors to our Website and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics. Cookies, by themselves, will not be used by IAC to disclose your individual identity. This information identifies your browser, but not you, to our servers when you visit our Website. If you want to disable the use of cookies or remove them at any time from your computer, you can disable or delete them using your browser (consult your browser’s “Help” menu to learn how to delete cookies); however, you must enable cookies to access certain information on the Website.

Below you will find a detailed list of the first-party cookies we may use on our Website:

FIRST-PARTY COOKIES			
Type of Cookie	Name	Purpose	Duration
_utma	Google	Part of Google Universal Analytics – used to distinguish users and sessions	2 years (persistent)
_utmb	Google	Part of Google Universal Analytics - used to determine new sessions/visits	30 minutes (session)
_utmc	Google	Part of Google Universal Analytics – used to determine whether the user was in a new session/visit	End of session (session)
_utmt	Google	Part of Google Universal Analytics – used to throttle request rate	10 minutes (session)
_utmz	Google	Part of Google Universal Analytics – used to store the traffic source or campaign that explains how the user reached the site	6 months (persistent)
_ga	Google	Part of Google Universal Analytics – used to distinguish users	2 years (persistent)
_gat	Google	Part of Google Universal Analytics – used to throttle requests	10 minutes (session)
_gid	Google	Part of Google Universal Analytics – used to distinguish users	24 hours (persistent)

Third-Party Cookies: IAC also uses third-party service providers to help us manage, carry out and improve our advertising. These parties may set cookies (such as the Doubleclick cookie) to help us collect information and provide you with advertisements that we believe would be relevant for you. From time to time, these third parties also may assist us by providing certain statistical and analytics information in relation to our marketing practices. The table below explains the third-party cookies we use

THIRD PARTY COOKIES			
Type of Cookie	Name	Purpose	Duration
NID	DoubleClick	Used by Google (YouTube) for ad personalization on embedded videos	6 months (persistent)
DSID	DoubleClick	Used by Google (YouTube) for ad personalization on embedded videos	2 weeks (persistent)
IDE	DoubleClick	Used by Google (YouTube) for ad personalization on embedded videos	1.5 years (persistent)

r/collect	DoubleClick	Used by Google (YouTube) for ad delivery on embedded videos	Session (session)
VISITOR_INFO1_LIVE	YouTube	Used by YouTube to estimate the users' bandwidth on pages with embedded YouTube videos	8 months (persistent)
YSC	YouTube	A unique ID to track statistics of what videos from YouTube a user has seen	Session (session)
player.vimeo.com	Vimeo	Used for embedding Vimeo videos	1 year (persistent)
vuid.vimeo.com	Vimeo	Used for embedding Vimeo videos	2 years (persistent)
.w.soundcloud.com	Soundcloud	Used for embedding Soundcloud audio	Session (session)
CP3	Soundcloud	Used for embedding Soundcloud audio – tracking for Scorecard Research	1 month (persistent)
UID	Soundcloud	Used for embedding Soundcloud audio – tracking for Scorecard Research	2 years (persistent)
UIDR	Soundcloud	Used for embedding Soundcloud audio – tracking for Scorecard Research	2 years (persistent)
sc_anonymous_id	Soundcloud	Used for embedding Soundcloud audio	6 months (persistent)
DSFirstAccess	IACConnect	Used for IACConnect Supplier Portal	Session (session)
DSID	IACConnect	Used for IACConnect Supplier Portal	Session (session)
DSLlastAccess	IACConnect	Used for IACConnect Supplier Portal	Session (session)
DSSIGNIN	IACConnect	Used for IACConnect Supplier Portal	Indefinite (persistent)
DSSignInURL	IACConnect	Used for IACConnect Supplier Portal	Session (session)

4. HOW WE USE YOUR INFORMATION

Below please find information about how we process information collected about you (including Personal Data) as well as the corresponding legal basis. We may process your information where the processing is:

- Necessary for entering into or the performance of a contract with you. For example:
 - To carry out our obligations arising from any contracts entered into between you and us.
 - To provide you with the information, products, and services that you request from us.
 - To process your supplier application and registration form, and to create online accounts for your organization and its authorized agents.
 - To communicate with you about our contracts and your account.
- Necessary for us to comply with a legal obligation.
- Necessary for the purposes of the legitimate interests pursued by a third party or us (to the extent it does not infringe on any data subject's fundamental rights and freedoms). For example:
 - To make sure that content from our Website is presented in the most effective manner for you and for your computer.
 - To allow you to participate in interactive features of our Website and services (when you choose to do so).
 - To keep our Website safe and secure (for example, security protection and fraud prevention).
 - To provide you with technical support and to improve our Website and services.
 - To provide you with information that you have requested and respond to your inquiries.
 - To notify you about changes to our service or our Website.
 - If you are an existing supplier, to communicate (including by e-mail and SMS) with you to provide information about goods and services similar to those that were the subject of a previous sale or negotiations of a sale to you.
 - Subject to applicable law and regulations, in the event of a sale, merger, consolidation, change in control, transfer of substantial assets, reorganization, or liquidation, to transfer, sell, or assign to third parties information concerning your relationship with us, including, without

limitation, Personal Data that you provide and other information concerning your relationship with us.

- To manage our everyday business needs, such as auditing, administration of our services, analytics, and the enforcement of any corporate reporting obligations or other policies.
- Pursuant to valid consent provided by you, in order to provide you with information about goods or services we feel may interest you. If you do not want us to use your data in this way, simply do not opt-in when we ask for your consent on the relevant forms where we collect your data. For any other purpose where you have provided valid consent where it is legally required.

5. DISCLOSURE OF YOUR INFORMATION

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. Subject to applicable law and regulations, we may disclose Personal Data that we collect or you provide as described in this Privacy Policy:

- To any member of our group, including our parent company International Automotive Components Group S.A. and its subsidiaries.
- To contractors, service providers, and other third parties we use to support our business or in connection with the administration and support of the activities noted above and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them (e.g., database hosting providers, managed services providers, payment processors, IT professionals, developers, consultants).
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of IAC's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by IAC about our Website users is among the assets transferred. This may also include exchanging information with a potential buyer or other successor in connection with the due diligence for any of the foregoing transactions.
- To fulfill the purpose for which you provide it (for example, if you email us asking us to contact a third party, we may transmit the contents of your email to the recipient).
- For any other purpose disclosed by us when you provide your information or with your consent when required by applicable law and regulations.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation; in order to enforce or apply our policies and

agreements, including for billing and payment collection purposes, or to protect the rights, property, or safety of IAC, our customers, or others. This may include exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. CROSS-BORDER TRANSFERS OF PERSONAL DATA

The data that we collect from you may be transferred to, and stored and processed in, the United States or in a destination outside the European Economic Area (“EEA”). It also may be processed by staff operating outside the EEA who work for us or by other entities acting as data processors processing data on our behalf. This includes staff engaged in, among other things, the fulfillment of your request or order and the provision of support services. Please note that the data protection and privacy laws of the United States or other jurisdictions outside the EEA may not be as protective as the laws in your country.

IAC has implemented international data transfer agreements on the basis of EU Standard Contractual Clauses in order to provide appropriate and suitable safeguards for personal data being transferred to countries outside the EEA where an adequate level of protection is not already guaranteed. A copy can be obtained by contacting IAC’s Data Privacy Coordinator at: IACdataprivacy@iacgroup.com. We will take all steps reasonably necessary to ensure that your data is treated securely and subject to appropriate safeguards in accordance with this Privacy Policy and applicable legislation.

7. DATA RETENTION

Unless otherwise required by law, IAC will erase Personal Data when it is no longer necessary in relation to the purposes for which was collected or otherwise processed; when you withdraw your consent (where lawfulness of processing was based on your consent) and there is no other legal ground for the processing; when you object to the processing and there are no overriding legitimate grounds for the processing; when your Personal Data has been unlawfully processed; and when it is necessary to comply with legal obligations.

8. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookie settings.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

- **Do Not Track.** We do not currently respond to “do not track” signals.
- **Communications from IAC.** If you do not wish to have your contact information used by IAC to promote our own products or services or provide general information, you can indicate your preferences on the forms we use to collect your data or ask us not to process your Personal Data for these purposes by contacting IAC’s Data Privacy Coordinator at: IACdataprivacy@iacgroup.com. Please note that this does not apply to information IAC provides in order to establishment an account with you, address your purchase order, warranty registration, product service experience, or other transactions.

9. YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA

Under applicable data protection law, you may have certain rights with respect to your Personal Data, including the following:

- The right to request access to your Personal Data, which includes the right to obtain confirmation from us as to whether or not Personal Data concerning you is being processed, and where that is the case, access to the Personal Data and information related to how it is processed.
- The right to rectification or erasure of your Personal Data, which includes the right to have incomplete Personal Data completed.
- The right to restrict or object to processing concerning your Personal Data, which includes restricting us from continuing to process your Personal Data under certain circumstances.
- The right to data portability, which includes certain rights to have your Personal Data transmitted from us to another controller.
- Where data processing is based on your consent, the right to withdraw consent at any time.

Any requests related to the above rights may be made by sending an e-mail to IAC’s Data Privacy Coordinator at: IACdataprivacy@iacgroup.com.

- In certain jurisdictions, you also have the right to lodge a complaint with a supervisory authority.

10. DATA SECURITY

We have implemented appropriate measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information over the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your data transmitted to us through our Website and shall not be liable for breaches of security or integrity, third-party interception in transit, or any damage caused to you or your company, your computer(s), or other property by accessing or using our Website or services. Any transmission of your Personal Data is at your own risk.

11. THIRD-PARTY WEBSITES AND SERVICES

Our Website may contain links or references to other websites outside of our control. Please be aware that this Privacy Policy does not apply to these websites. We encourage you to read the privacy statements and terms and conditions of any linked or referenced websites you enter. These third-party websites may use their own cookies and tracking devices, log your IP address, and otherwise collect data or solicit your Personal Data.

Your access to or use of our Website also may involve interaction with or use of third party services or features, such as embedded videos hosted by third parties (“Third Party Services”). This Privacy Policy also does not apply to Third Party Services, and, for the same reasons as above, you should consult those third parties’ privacy statements and terms and conditions before using their services.

IAC DOES NOT CONTROL AND IS NOT RESPONSIBLE FOR WHAT THIRD PARTIES DO IN CONNECTION WITH THEIR WEBSITES, OR HOW THEY HANDLE YOUR PERSONAL DATA. PLEASE EXERCISE CAUTION AND CONSULT THE PRIVACY POLICIES POSTED ON EACH THIRD-PARTY WEBSITE FOR FURTHER INFORMATION.

12. CHILDREN UNDER THE AGE OF 16

Our Website is not intended for children under 16 years of age, and IAC does not knowingly collect or use any personal data from children under the age of 16. No one under the age of 16 may provide any information to or on the Website. If we learn we have collected or received personal data from a child under the age of 16, we will delete that information. If you believe we might have any information from or about a child under the age of 16, please contact IAC’s Data Privacy Coordinator at: IACdataprivacy@iacgroup.com.

13. CALIFORNIA PRIVACY RIGHTS

Under California Civil Code section 1798.83, California residents who have an established business relationship with us are entitled to ask us for a notice describing the types of personal customer information we have shared with third parties for those parties’ direct marketing purposes during the preceding calendar year. That notice will identify the categories of information shared with third parties, the names and

addresses of those third parties, and examples of the types of services or products marketed by those third parties. If you are a California resident and would like to request a copy of this notice, please submit a written request to IAC's Data Privacy Coordinator at: IACdataprivacy@iacgroup.com.

14. REVISIONS TO OUR PRIVACY POLICY

We reserve the right to change this Privacy Policy at any time. Any changes we make will be posted on this page. If we make material changes to how we treat your Personal Data, we will notify you through a notice on the Website home page. The date this Privacy Policy was last revised is identified at the top of the page. You are responsible for periodically monitoring and reviewing any updates to this policy. Your continued use of our Website after such amendments will be deemed your acknowledgement of these changes to this Privacy Policy.

15. CONTACT INFORMATION

Should you have any questions or concerns about this Privacy Policy and our privacy practices, you may contact IAC's Data Privacy Coordinator at: IACdataprivacy@iacgroup.com.