



## **AGC Heat Transfer Inc Privacy Policy**

AGC Heat Transfer Inc. believes that your personal data belongs to you. We aim to respect and process your personal data with due care at all times. When visiting our website, you shall feel confident that your privacy is respected.

The purpose of this policy is to inform you of the types of Personal Data we collect when you use one of the AGC Heat Transfer Inc. website and the steps we take to protect and safeguard your personal information.

This policy and its principles apply to personal identifiable information we ask for and that you provide. By this we mean information that directly or indirectly identifies you, such as your name, physical address, e-mail address, IP number or other contact details.

We aim to process personal data that is adequate, relevant and not excessive in relation to the purpose for which it has been collected. We believe in being transparent about the types of personal information and why we collect your information. We only collect and process personal information where we have lawful grounds to so, and in accordance with Data Privacy Laws.

On request, AGC Heat Transfer Inc. will provide you with further information regarding our processing and protection of your personal data when visiting our websites. Please see the contact section below.

### **Personal Data collection**

We hope the following information will help you make an informed decision about sharing your personal information with us. You are always free to decide if you want to provide your personal identifiable information or not.

### **Just visiting our website**

For accessing and browsing our website and most other services, we do not require personal identifiable information. We may collect limited non-personal identifying information your browser makes available whenever you visit a website. For example, your Internet Protocol address, browser language, geographical location data, date and time, and cookies. We use non-personal information to better understand the user experience and interaction with the sites and to further improve our offerings and services. AGC Heat Transfer Inc. website only uses "First Party Cookies", specifically only Google Analytics. These kinds of cookies DO NOT require informed consent. This can be verified by going to: <http://www.cookie-checker.com/check-cookies.php?url=www.agcheattransfer.com>

### **Creating an Account**

We also provide services which require you to register a personal account. To register an account, we need certain personal identifiable information which we use to create the account and to provide the services you requested. This personal identifiable information will only be used for the specific purpose for which it was collected for.

### **Applying for a Job online**

Whenever we request personal identifiable information, we will inform you about what types of data we collect and how we use it. In general, if you are applying for a job online we will use your information to process your application.



### **Connect for Business**

Where you request to receive newsletters, marketing and promotional material, general information or connect with us online, we may (depending on type of contact you request) collect the following personal identifiable information, for example:

- Contact details (e-mail, address, phone, professional title or role), company name, gender and language preferences;
- Event, meeting (including feedback about content and services at events you attend through surveys), travel information;
- Where connecting on social platforms, we may also collect information you submit or post to and from our Services.
- We may also collect your precise, real-time location using beacon technology, GPS, cell phone towers, Wi-Fi signals, and/or future technologies.
- We might look at how often you use an app and where you downloaded it.

We may also collect information from business partners, from third parties acting on your behalf, and other platforms that help provide Services. For example, we may receive meeting data from an event registration provider.

We use your personal identifiable information to provide you with the requested services and may send you marketing and promotional material relevant to you, including invites to events and seminars, product and service offerings, to keep in contact and to provide you with news, updates and other business-to-business related information relevant to you.

You may at any time ask us to delete your personal identifiable information. Please contact [datacontroller@agcheattransfer.com](mailto:datacontroller@agcheattransfer.com)

### **AGC Heat Transfer Inc. is responsible as controller**

AGC Heat Transfer Inc., headquartered in Bristow, VA USA is the data controller of personal information collected via our website and which you entrust to us. We always aim to comply with the General Data Privacy Regulation and other applicable Data privacy laws. If you have any complaints relating to our handling of your personal identifiable information that cannot be resolved with us directly, please contact the Swedish Data Protection Authority at [alfa.laval@alfalaval.com](mailto:alfa.laval@alfalaval.com) AGC Heat Transfer Inc. Parent Company.

### **Legal grounds for Collection and Processing of Personal Data.**

Depending on what services you request from us, we only process your personal identifiable information where we have legal grounds to do so. Where we require your consent to collect and process your personal data, the request form will be provided in a clear and specific manner.

If we have asked for your consent, it can always be revoked at any time by contacting us and we will not use or process your personal identifiable information any more.



### **Sharing of information**

As a general rule, AGC Heat Transfer Inc. never rents or sells your personal identifiable information to other companies or individuals, unless we have your consent. We may share such information in any of the following limited circumstances:

- With your consent.
- To trusted businesses or persons for the sole purpose of processing your request on our behalf. Where this occurs, such parties are subject to agreements which require them to process such information only on our instructions and in compliance with this Privacy Policy and appropriate confidentiality and security measures.
- Where we are required by law or have good faith to believe that access, preservation or disclosure of such information is reasonably necessary to protect the rights, property or safety of AGC Heat Transfer Inc, its users or the public.

We may store and process personal information collected on our site in any country in which AGC Heat Transfer Inc. or our hosting providers maintain facilities. By using our services, you consent to the transfer of your information among these facilities, including those located outside your country.

### **Sharing of Account-specific information**

When you have created an account with us we may share information submitted under your account among all our services as well as distributors and channel partners to provide you with a seamless experience and to improve the quality of our services. We will not disclose your account information to other people or non-affiliated companies, except in the limited circumstances described in this Policy or with your consent.

We only share your Information with data platforms and cloud providers that perform services on our behalf. We share Information with companies that help us operate and support our Services. Some vendors may be located in a country other than where you live. We may also share Information with analytics and search engine providers who act on our behalf.

### **Security Measures**

We aim to implement appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data.

We restrict access to your personal data to our employees and suppliers who need to use the information in order to process it on our behalf, and who are required to keep your personal data secure and confidential.

### **Updating your information**

Where we process your personal data, we aim to ensure that it is accurate and up-to-date. We will seek to erase or rectify personal data that is inaccurate or incomplete. If you need to update or correct your personal identifiable information, please contact [datacontroller@agcheattransfer.com](mailto:datacontroller@agcheattransfer.com) with your request and we will provide you with the mechanism for updating and correcting your personal identifiable information.



### **Retention**

We will only retain your personal data for as long as it is necessary to fulfil the purposes outlined in this policy or the purposes of which you have otherwise been informed. We will retain your data for as long as permitted under applicable legal grounds between seven and ten years, after that it will be deleted.

If our legal grounds rely on your consent, you may revoke your consent at any time. Where you have exercised your right to withdraw your consent we may be required to keep your personal identifiable information for a defined period in order for us to meet our legal obligations and defend ourselves in legal disputes under certain circumstances.

### **Links to third party sites**

Services may include links to other websites whose privacy practices differ from ours. These external sites may place their own cookies on your computer, collect data or solicit personal information. If you submit Personal Information to any of those sites, your Information is governed by their privacy policies. AGC Heat Transfer Inc. does not exercise any control, or assume any responsibility for these sites, and we encourage you to carefully read the privacy policy of any website you visit.

### **Your Rights as an individual under this Policy**

Since we process your Personal Data you can exercise certain rights during specific circumstances. In relation to your Personal data you may request to:

- Access your Personal Data (data subject access request)
- Rectify your Personal Data
- Erase your Personal Data
- Restrict the processing of your Personal Data
- Object to the processing of your Personal Data
- Withdraw your consent

All requests must be made in writing and be signed by you, and include information on name, address and, preferably, your e-mail address to verify your identity. Where the applicable law provides for an administrative fee for complying with such a request (including frivolous or excessive requests) such a fee may be charged by AGC Heat Transfer Inc.

All valid requests will be dealt with in a prompt and proper manner and we will respond within 30 days upon receiving your request.

To make your request, please contact [datacontroller@agcheattransfer.com](mailto:datacontroller@agcheattransfer.com)

If your request has been denied for the stated reasons, you may file a complaint to the local data protection authorities in the jurisdiction of the office in which the services are being provided.

### **Changes to this Notice**

AGC Heat Transfer Inc. reserves the right to amend this policy from time to time. We expect most such changes to be minor, but there may be changes that are more significant. The date of the last modification is stated at the end of this document.



We will post those changes on this page and we will also provide a more prominent notice if the changes are significant. Each version will be noted at the top of the page. Prior versions of this Privacy Policy will be kept in an archive to view.

**Contact**

If you have any additional questions or wish to exercise your rights, please feel free to contact us any time at [datacontroller@agcheattransfer.com](mailto:datacontroller@agcheattransfer.com)

**Version**

This policy was published in May 2018



## Updated Privacy Policy

Valid from May 25, 2018

Dear Customer,

We are contacting you regarding data privacy. For us it has always been important that your personal information is handled in a safe manner. Therefore, we welcome the GDPR (General Data Protection Regulation) - a new EU regulation, which will take effect on May 25, 2018.

Many things are the same, but the protection of your personal integrity is improved. Therefore, we have updated our Privacy Policy that describes how and why we process your information.

You do not need to do anything, but if you want, you can read more about our Privacy Policy on our web site.

Best regards,

*Katherine Ortiz*

*Financial Controller*

**AGC Heat Transfer Inc.**

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*"Building the Best, Servicing the Rest"*

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## Privacy Statement for Suppliers

On 25 May 2018, the new EU General Data Protection Regulation 2016/679 (GDPR) takes effect, which is why we, AGC Heat Transfer Inc, would like to provide some information about the data we process to send information to you as a Supplier. AGC Heat Transfer Inc. or any of its subsidiaries are responsible as the controllers of your data which we collect and process while doing business with you and your company. We respect your privacy and will protect all your personal data that we process. All personal data is processed in accordance with applicable data protection laws.

## Information on how we process your Personal Data

### How we collect and use Personal Data

In general, we collect your contact details (such as your address, email address and telephone number) and information such as your job title, which we may request from you.

We will process your Personal Data if, and to the extent applicable law provides a lawful basis for us to do so. We will therefore process your Personal Data only:

- a) if we need it to perform the contract we have entered into with you
- b) if we need it to comply with a legal obligation

### How we handle your Personal Data

Your personal data is stored in databases managed by AGC Heat Transfer Inc. or its subsidiaries. We will process the personal data you provide to us in accordance with data protection standards required by applicable law. For the above listed purpose, your personal data may be accessible to use by AGC Heat Transfer Inc. personnel, including those located outside the European Economic Area (EEA). For transfer of your information outside EEA, we will ensure compliance with the General Data Protection Regulation (GDPR) or higher standards under other laws applicable to such personal data.

### Data Retention

Your data will be retained for no longer than is necessary and in accordance with our data retention policy. We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

### Your rights

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- request access to your Personal Data (commonly known as a “data subject access request”) and request certain information in relation to its processing;



- request rectification of your Personal Data;
- request the erasure of your Personal Data;
- request the restriction of processing of your Personal Data;
- object to the processing of your Personal Data.