



# **FLEX|N|GATE Group**

## **Privacy Policy**

Effective Date: May 25, 2018

Flex-N-Gate is committed to protecting the privacy and security of the personal information of our customers, vendors and employees. Like many of our customers and vendors, FNG is working hard to prepare our programs for the EU General Data Protection Regulation (GDPR), which is in full effect since May 25, 2018.

This Privacy Policy does not apply to information which is protected by confidentiality, privilege, or any other similar protections.

Nothing is changing about your current settings or how your information is processed. Rather, we've improved the way we describe our practices and how we explain the options you have to update, manage, export, and delete your data. This is not a new effort for us, but rather a continuation of an existing company commitment to transparency with our customers, vendors and employees regarding our data collection, use, retention and sharing practices. This is also a continuation of our commitment to implement appropriate technical security measures to protect all FNG stakeholders.

FNG builds on the foundation and discipline necessary to develop and support some of the leading privacy and security products in the world. As part of our Privacy and Security Program, we are implementing a governance structure to engage senior management on data privacy and security issues as well as train each of our employees on privacy and security expectations. This structure also aligns policies, procedures and technical controls to demonstrate our process and our commitment to our customers and users.

Further, we are extending embedded privacy and security by design into our product life cycle processes, and implemented a program to manage third-party risk. We remain fully committed to approaching this initiative diligently with the utmost focus on securing and maintaining customer and vendor trust.

*What information do we collect?*

We do not collect any personal information about you unless you affirmatively provide it to us.

*How will FNG use the information you provide?*

We may use the information you provide us for a number of different purposes. Specifically, we may use the information to respond to any requests you have submitted. Other potential uses of this data include:

- To comply with the law or in response to a subpoena, court order, law enforcement or government request, or other legal process;
- To produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigation, or other legal or administrative proceedings;
- To protect the interests, rights, safety, or property of FNG, our associates, our customers, our vendors, or others;
- In connection with internal organizational matters;
- To combat fraud or other criminal activity;
- For any other purpose disclosed by us when you provide the information; and
- As otherwise required or permitted by law.

*How may we share the information we collect?*

FNG is a global manufacturer of advanced automotive components for supply to the passenger vehicle industry. Our various plants, engineering and administrative locations share information with each other for business purposes such as internal administration, billing, and providing you or any organization with services. In order to provide the information and services described in this Privacy Policy, we may share your personal information and other information with our other offices or with carefully selected vendors (duty bound to confidential treatment) that perform services on our behalf.

*What is our legal basis for processing your personal data?*

We rely on the following legal grounds to process your personal information, namely:

- (a) Performance of a contract – To the extent you are an employee, customer or supplier of FNG or wish to become one, we may need to collect and use your personal information to perform the services for which you have contracted with us. For example, we may use your personal information to respond to requests you make via our website, email, phone call, and provide you with such services.
- (b) Consent – Some of the personal information collected by FNG is provided by you voluntarily, for example when you sign up for employment, service contract, production contract, visit FNG location or contact us by any means of communication, and is therefore collected and used with your permission. To withdraw your consent to such use, you can contact us at [privacyofficer@flexngate.com](mailto:privacyofficer@flexngate.com).
- (c) Legitimate interest – We may use your personal information for our legitimate interests, such as employment, delivery, payment, ordering, production, visit, or to improve our products and services. We may also use your contact information to keep you and others who have provided us with their contact information up-to-date on recent

developments of interest. If you wish us to stop using your contact information in this manner, you can contact us at [privacyofficer@flexngate.com](mailto:privacyofficer@flexngate.com).

*Is your data transferred to third countries and how is it protected?*

The information we collect from and about you, including your personal information, may be transferred to countries other than the one in which you reside. Any information transferred to a third country will be secured in the same manner as if it would be in your own and will be done pursuant to all applicable laws. In cases of transfers outside from the European Union, information is transferred, stored and processed in accordance with all applicable laws.

*How do we secure your information?*

We use reasonable administrative, technical, and physical security measures to protect your personal information from unauthorized access and use. This may include, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with safeguards designed to provide a level of protection equivalent to that adopted by FNG.

However, no system of transmission or storage of data can be 100% secure. As such, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet.

*How long do we hold your information?*

We retain the information that we collect no longer than is reasonably necessary to fulfill the purposes for which we collect the information and to comply with our legal obligations.

*What are your rights?*

If you no longer wish us to retain your information – you can let us know by contacting us at [privacyofficer@flexngate.com](mailto:privacyofficer@flexngate.com).

If you are a resident of the European Union, you may have certain rights regarding information that we have collected and that is related to you. In particular, you may have the right to:

- Access and correct the personal information FNG has about you;
- Object to the processing of your personal information; or
- Request that your personal data be erased.

If you wish to exercise those rights, please contact us at [privacyofficer@flexngate.com](mailto:privacyofficer@flexngate.com).

Likewise, if you are a resident of the European Union, you have the right to complain to a Data Protection Authority if you believe that your personal information has been collected or used in violation of relevant privacy requirements. You may file such complaint with the Data Protection Authority in the country in which you are located, or you may contact the Office of the Information Commissioner in the United Kingdom at [www.ico.org.uk](http://www.ico.org.uk), by telephone on +44 (0)303 123 1113 or by writing to this address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF United Kingdom.

*Who is the data controller?*

The data controller for the FNG Digital Services can be contacted on:  
[privacyofficer@flexngate.com](mailto:privacyofficer@flexngate.com).