

Privacy Policy

For the purposes of applicable data protection and privacy laws, Hamilton Products Group ("Hamilton Products Group", "us", "we"), with its registered offices at 5063 Champions Way, Milford, Ohio 45150, uses and manages in accordance with this Privacy Policy ("Policy"). Hamilton Products Group is an independent business unit of our parent company, Gunnebo. For a full list of Gunnebo Group entities, [please click here](#).

Protecting your privacy is important to Hamilton Products Group. We are committed to protecting all Personal Data provided to Hamilton Products Group, whether by individuals with whom we do business, visitors to and users of our websites, or otherwise. Personal Data is information that relates to an identified or identifiable living individual.

This policy explains what Personal Data we collect, how we may use and manage it, and the rights you have concerning your Personal Data. Before you provide us with any Personal Data or browse our website, you should read through this Policy fully and ensure you are comfortable with our privacy practices.

Please note that our website may contain links to other websites. These third-party sites are not subject to this Policy, and we recommend that you check each website's privacy and security policies. We are only responsible for the privacy and security of the data we collect and have no control over the actions of any third parties regarding your data.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

Privacy or Security Safeguards (AUG 1996)

- (a) The Contractor shall not publish or disclose in any manner, without the Contracting Officer's written consent, the details of any safeguards either designed or developed by the Contractor under this contract or otherwise provided by the Government.

Whose Personal Data do we collect?

Hamilton Products Group collects Personal Data from a range of individuals in the context of its business activities, including:

- representatives of our suppliers, customers, and other business contacts;
- contractors;
- users of our website;
- individuals who contact us by any means; and
- job applicants.

How do we collect your Personal Data?

We obtain Personal Data that you knowingly and voluntarily disclose to us, both online and offline. We collect Personal Data when you:

- visit our website and/or complete one of our lead generation forms;

- contact our customer service centers or request information from us in any other way;
- visit our premises;
- submit an order to us;
- communicate with us via social networking websites, third-party apps, or similar technologies.
- subscribe to our blog, newsletters, emails; and
- visit one of our trade counters at an exhibition.

We may also collect information from third-party sources, such as those related to your use of other websites we operate, and from related third parties, such as subcontractors.

What Personal Data we collect

Hamilton Products Group may collect a range of Personal Data from you in a business context, such as your name, gender, job title, photographic identification, email address, home address and other contact details, details of your business and other interests, communications with you (including notes from meetings), Hamilton Products Group products or services that we have provided you or that you might have an interest in and financial and payment information.

When you use our website, we collect certain standard information your browser sends. This includes technical information, such as your IP address, browser type, operating system, language, time zone setting, access times, country, and any referring website addresses.

The purposes for which we process your Personal Data

We process your Personal Data for the following purposes:

- to provide you with information, products, and services ordered by you;
- to notify you of any changes to your services and to provide you with information concerning similar goods and services that may be of interest;
- to provide you with information about our market environment, events, and product launches;
- to communicate with you and third-party contacts;
- to administer our website and help improve our products and services;
- to carry out analytics in relation to the use of our website;
- to comply with applicable laws and regulations; and

- other business-related purposes, including negotiating, concluding, and performing contracts; managing accounts and records; supporting corporate social responsibility activities; legal, regulatory, and internal investigations, and debt administration.

Recruitment

When you apply for a job via our website or otherwise, we will collect additional, more specific Personal Data about you, such as your qualifications, career history, third-party references, and interview notes. We may also ask you for other information, such as your interests and the types of jobs you are interested in. Any personal data you provide to Hamilton Products Group concerning a job vacancy will be processed per our Recruitment Privacy Notice.

The legal basis for Hamilton Products Group processing your Personal Data

To comply with applicable data privacy laws, Hamilton Products Group must establish the legal basis for processing your Personal Data. Under the purposes for which we collect and use your Personal Data, as set out above, the legal basis for Hamilton Products Group processing your Personal Data will typically be one of the following:

- your consent;
- the performance of a contract that we have in place with you or other individuals;
- Hamilton Products Group or our third parties' legitimate business interests; or
- compliance with our legal obligations.

Who we share your Personal Data with

Hamilton Products Group may share your Personal Data with people within the company who have a "need to know" that data for business or legal reasons, such as to carry out an administrative function such as processing an invoice or direct a query that you have submitted to the relevant department within Hamilton Products Group.

We may disclose your Personal Data to third parties, including the authorities, Hamilton Products Group's advisors, suppliers of IT services, and third parties engaged by Hamilton Products Group to provide services requested by you to protect any intellectual property rights in any materials displayed on or otherwise available from Hamilton Products Group's website; to seek legal or other professional advice; to respond to a legal request or comply with a legal obligation; and to enforce Hamilton Products Group's website Terms and Conditions of Use.

We may disclose your Personal Data to third parties in the event that we sell, buy, or merge any business or assets, including to the prospective seller or buyer of such business or assets.

Because Hamilton Products Group operates globally, we may share the Personal Data you submit with any entity within the Gunnebo Group worldwide. These entities are required to maintain the confidentiality of your data and are restricted from using it for any purpose other than the purposes set out in this Policy.

We may decide to allow users to share comments, postings, testimonials, or other information. If you choose to submit such information to us, the information that you submit may be available generally to the public. Information that you provide in these areas may be read, collected, and used by others who access them.

Finally, we may share non-personal Data with third parties not described above. When we do so, we may aggregate or de-identify the information so that a third party would not be likely to link data to you, your computer, or your device. Aggregation means combining the non-personal Data of numerous people so that the data does not relate to one person. De-identify means that we attempt to remove or change certain pieces of information that might be used to link data to a particular person.

Transfers of Personal Data

Please note that any person to whom Hamilton Products Group may disclose your Personal Data under this Policy may be situated in a country other than your own and that such country may provide a lower level of data protection requirements than your own country. By agreeing to this Policy, you consent to transferring your Personal Data to a country other than yours.

Whenever we transfer Personal Data across borders, we take legally required steps to ensure that adequate safeguards are in place to protect your Personal Data and that it is treated in accordance with this Policy. If you are located in the EEA or the UK, you can request a copy of the safeguards we have put in place to protect your Personal Data and privacy rights in these circumstances using the Contact Us form available on our website.

Security

Hamilton Products Group takes all reasonable technical and organizational security measures to protect Personal Data from accidental or unlawful destruction, accidental loss, and unauthorized access, destruction, misuse, modification, or disclosure.

Records retention

Your Personal Data is not kept for longer than is necessary for the purposes for which it is collected. This means that data and records (including Personal Data) are destroyed or erased from our systems when no longer required. The amount of time that records are kept varies depending upon the type of Personal Data they contain.

Your rights

Applicable data privacy laws give individuals rights to Personal Data that organizations hold about them. If you wish to:

- request a copy of the Personal Data that we hold about you or
- request that we rectify, delete, or limit the processing of your Personal Data,

Please submit your written request via our consent page.

[If you decide that you do not want to receive commercial communications from us, whether by email, telephone, or post, you can "opt-out" from receiving such communications by clicking on the "unsubscribe" link provided at the bottom of each commercial email and updating your preferences.

Questions and complaints

If you have a concern or complaint about how Hamilton Products Group has used your Personal Data, as a first step, you should raise this in writing with us using the contact details available on our website. If you are unsatisfied with Hamilton Products Group's handling of your concern or complaint, you can escalate this to your national Data Protection Authority.

Changes to this Policy

We reserve the right to modify or amend this Policy at any time by posting the revised Policy on our website. You are responsible for reviewing the Policy every time you submit information to us or place an order.

Cookies

A cookie is a small data file a website may write to your hard drive when you visit. A cookie file can contain information (such as a user ID) that the website can use to track the pages you have visited and your preferences. The only Personal Data a cookie can contain is information you personally supply. A cookie cannot read data from your hard disk or read cookie files created by other websites.

Hamilton Products Group uses cookies to track user traffic patterns and to provide better service when users visit the website.

Users can set their browsers to notify them when a cookie is received. They can also refuse all cookies by turning the function off in their browsers. However, to ensure the full functionality of the Hamilton Products Group website, cookies are required.

When first accessing a Hamilton Products Group website, a banner will appear explaining the website's cookie use.

Social media features

HamiltonProductsGroup.com includes social media features, such as sharing or following buttons. These

features may collect your IP address and which page you are visiting on our sites and may set a cookie to enable the feature to function properly.

Social media features are hosted by a third party or directly on our websites. This Policy does not apply to these features. Your interactions with these features are governed by the privacy policies of other companies.

Glossary

Data Controller - A party that determines the purposes and means of data processing.

Data Protection Authority - The relevant supervisory authority with responsibility for privacy or data protection matters in the jurisdiction of Hamilton Products Group and/or the Gunnebo Group;

Personal Data - Information that relates to an identified or identifiable individual (i.e., data about Hamilton Products Group employees, contractors, applicants, employees of vendors and suppliers, contractors, customers, patients using our products, and individuals who use our website or service centers). It includes names, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g., data associated with a particular cookie) and IP addresses when such information can be linked to an individual.

Processing—Anything done with Personal Data; this includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.

Recruitment Privacy Notice

i) Introduction

This Notice explains how Hamilton Products Group handles Personal Data about our job applicants and the rights applicants have under data protection law. We refer to this type of information as "Application Data."

This Notice applies to applications submitted via job pages, LinkedIn, Indeed, Hamilton Products Group's website or intranet, and third parties, such as recruitment agencies and job boards. It also applies to applications submitted via other means, such as post and email.

Please refer to the Glossary below for an explanation of the defined terms in this Policy.

ii) Overview: the Hamilton Products Group 10 Data Protection Principles

Hamilton Products Group observes the Hamilton Products Group 10 Data Protection Principles about Application Data:

Fairness and Transparency: Give people information about how Hamilton Products Group processes their Application Data.

Lawful Processing: Make sure we always have a good, lawful reason to process Application Data.

Purpose Limitation: Only collect Application Data for a specific business need of Hamilton Products Group. If we want to reuse the Application Data for a new purpose, we must make sure the two are compatible.

Data Minimization: Only process as much Application Data as we need, and no more.

Accuracy: Keep Application Data accurate, complete, and up-to-date.

Retention: We should only keep Application Data for as long as necessary. If we no longer need it, we must delete it or anonymize it.

Security: Protect Hamilton Products Group's Application Data from getting lost or stolen. Make sure our service providers protect our Application Data as well.

Individual Rights: Individuals should be able to access, correct, or erase their Application Data or object to its use for certain purposes.

Application Data Transfers: Put safeguards in place before sending application data outside of the US.

Accountability: Hamilton Products Group will take steps to make sure our processing of Application Data complies with these 10 Data Protection Principles.

iii) What Application Data does Hamilton Products Group collect?

Hamilton Products Group will generally only collect Application Data in the recruitment process necessary to assess you for the post you applied for. This may include the following categories:

- Information you provide to set up an account ("Profile") on job pages, such as your email address;
- Information you provide to apply for a job vacancy with Hamilton Products Group to tell us who you are and to build a picture of your capabilities and suitability for certain positions, such as your name, contact information, nationality, professional qualifications, previous employment history, personal interests, experiences and a copy of your résumé;
- Information collected by Hamilton Products Group as a result of the recruitment process, such as your performance at assessment centers, interviews, or in other assessments and information provided by your referees; and

- Information related to your use of our website, such as your IP address, may be collected using cookie technology. For more information about how Hamilton Products Group uses cookies, please see our Privacy Policy.

Personal Data about criminal convictions or medical information will only be sought where local law permits.

We will indicate whether the information we have requested is mandatory or optional.

iv) What will Hamilton Products Group do with your Application Data?

The main purposes for which we use Application Data include:

Supporting and processing your job application, for example, so we can assess your ability to meet the job specification, in order to shortlist applicants and verify references and professional qualifications provided by those applicants;

Improving our application process, for example, to ensure that our website, intranet, and job-page portal are user-friendly and contain appropriate and helpful information; and

[Ensuring compliance with our Code of Conduct, for example, to ensure that we are living up to our values and, in particular, for equal opportunities monitoring purposes.]

We may verify the Application Data you provide during the recruitment process and/or collect Personal Data about you from sources other than you to assist with our 'Pre-Employment Checks'. This may include checking your qualifications, directorships, financial history (e.g., bankruptcy), and if you have a criminal record. If this occurs:

You will be told in advance which aspects of your Application Data will be verified including an explanation of how the Pre-Employment Checks will be carried out; and

Information about criminal convictions (if collected) or medical information will only be collected through official authorized sources and in accordance with applicable law.

Where it is necessary and appropriate to you're the role you have applied for, we may also require you to undertake drug and alcohol testing prior to commencing your employment with us.

IMPORTANT: If you indicate that you do not have the right to work in the country in which you are applying for a position, the system will automatically drop your application and it will not be reviewed by Hamilton Products Group. However, if you would like to explain your circumstances to us, please contact us using the contact information set out in paragraph 9 below.

Hamilton Products Group will only process your Application Data where we have a legal basis for doing so. Hamilton Products Group's processing of Application Data is generally because it is necessary for us to decide whether to enter into a contract of employment with you. In addition, certain data processing may be based on your consent (which you have the right to withdraw) or because it is necessary to comply with a legal obligation or to enable us to pursue our legitimate business interests (for example where it is

necessary to understand our applicants in sufficient detail so we can deliver an effective recruitment service).

v) Who is your Application Data disclosed to?

a. Within Hamilton Products Group

Hamilton Products Group restricts access to Application Data to people within Hamilton Products Group who have a "need to know" that information. For example, certain individuals throughout Hamilton Products Group will have access to your Application Data in order to process your job application and manage the recruitment cycle.

b. Outside Hamilton Products Group

Hamilton Products Group shares Application Data with authorized third-party service providers to conduct and manage recruitment. For example, we may share your personal information with these service providers to screen and verify your application and the information you have provided to Hamilton Products Group. This includes verifying academic and professional qualifications.

Generally, Hamilton Products Group will only disclose your Application Data to third parties outside Hamilton Products Group and its suppliers:

when required to do so by law;

in response to a legitimate request for assistance by the police or other law enforcement agency; and

to seek legal advice from Hamilton Products Group's external lawyers or in connection with litigation with a third party.

vi) How long will Hamilton Products Group retain your Application data?

We keep your application data according to our internal retention policies and procedures. Typically, if you are unsuccessful in your job application with us (or if you reject the position), your Application Data will be destroyed usually within [6-18 months] (depending on the jurisdiction) to comply with our legal obligations and so that we may contact you again if another suitable position arises. Please contact us if you would like more information on how we retain your application data.

If you successfully apply and join Hamilton Products Group, we will retain your Personal Data under our internal data retention guidelines and procedures. More information will be provided when you start.

vii) Where does Hamilton Products Group store your Application data?

Applicants should be aware that their Application Data may be transferred to and stored at a destination outside their country of residence, which may have less strict or no data protection laws than those of their country of residence. It may also be processed by staff operating outside of their country of residence who work for us or for one of our suppliers, for example, in the provision of support services.

Whenever we transfer your Application Data outside of your country of residence, we will take legally required steps to ensure that adequate safeguards are in place to protect your Application Data and to make sure it is treated securely and in accordance with this Notice. If you are located in the EEA or the UK,

you may contact us for a copy of the safeguards that we have put in place to protect your Application Data and privacy rights in these circumstances.

viii) Exercising your rights

You may have the right to request access to, rectification, or erasure of the Application Data Hamilton Products Group holds about you. You may also have the right to object to or restrict certain types of processing of your Application Data and request to receive a machine-readable copy of the Application Data you have provided to Hamilton Products Group. Remember that you can update your contact information in your online account Profile.

Any request to exercise one of these rights will be assessed by Hamilton Products Group on a case-by-case basis. There may be circumstances in which we are not legally required to comply with your request because of the laws in your jurisdiction or because of relevant legal exemptions provided for in data protection legislation.

ix) Contact us

Please contact Hamilton Products Group via our website if you would like to find out more about any matters relating to this Notice or to exercise your rights as outlined in paragraph 8 above.

If you have concerns about how Hamilton Products Group has handled your Application Data, you can complain to your Data Protection Authority. However, we encourage you to raise these concerns with Hamilton Products Group in the first instance.

Glossary

Application Data: Personal Data relating to job applicants.

Data Protection Authority: The relevant supervisory authority responsible for privacy or data protection matters in the jurisdiction of Hamilton Products Group and/or a Hamilton Products Group, LLC.

Personal Data: Information that relates to an identified or identifiable individual (i.e., data about Hamilton Products Group employees, contractors, applicants, employees of vendors and suppliers, contractors, customers, patients using our products, and individuals who use our website or service centers). It includes names, email addresses, job applications, user account information, and correspondence. Personal Data can also include web browsing information (e.g. data associated with a particular cookie) and IP addresses, when such information can be linked to an individual.

Pre-Employment Checks: Personal Data relating to a potential Hamilton Products Group employee collected from sources other than the candidate, such as directorships, financial history, qualifications, and criminal record.

Processing: Doing anything with Personal Data includes collecting it, storing it, accessing it, combining it with other data, sharing it with a third party, or even deleting it.