# NOTICE TO INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA, THE UNITED KINGDOM AND SWITZERLAND

This Notice only applies to individuals that access or use our Service while located in the EEA, United Kingdom and/or Switzerland (collectively, the "EEA"). We may ask you to identify which country you are located in when you use some of the Services or we may rely on your IP address to identify which country you are located in. When we rely on your IP address, we cannot apply the terms of this Notice to any individual that masks or otherwise hides their location information from us so as not to appear located in the EEA. If any terms in this Notice conflict with other terms contained in this Privacy Policy, the terms in this Notice shall apply to users in the EEA. This Privacy Notice should be read in conjunction with our general <u>Privacy Policy</u> for general use of our websites.

# Our Relationship to You

This Privacy Policy is provided on behalf of IDEAL and each of its family of companies, and there are no joint controllers with regard to Personal Information collected under this Privacy Policy. Depending on the type of or location our services are provided, different Entities may be the data controller in relation to your Personal Information. The data controller ("we", "us", "our") is the Entity named when we collect your Personal Information or in the location where IDEAL referred you to this Privacy Policy (e.g., the Entity identified in the email signature containing a link to this Privacy Policy). If no Entity has been clearly identified, the data controller or data controllers may be identified in the following order or precedence:

- For Personal Information that IDEAL collects on or through its websites and mobile applications, the Entity that operates the website or mobile application is the data controller.
- For Personal Information that is collected in connection with our newsletters and other marketing message, the data controller is identified on the subscription form and in each subsequent marketing message you receive.
- For Personal Information collected in connection with invitations and participation in events, the data controller will be the Entity which is organizing such event as identified in the announcement for the event.
- For Personal Information collected in the context of a recruitment process, the data controller is the Entity identified in the job posting.
- For Personal Information that IDEAL collects pursuant to a customer or contractor relationship, the IDEAL Entity with which you have the customer or contractor relationship is the data controller.
- For activities in the context of the procurement of products and services, the data controller will be the Entity identified in the order form or agreement.

### Marketing

We will only contact individuals located in the EEA by electronic means (including email or SMS) based on our legitimate interests, as permitted by applicable law or the individual's consent. When we rely on legitimate interest, we will only send you information about our Services that are similar to those which were the subject of a previous sale or negotiations of a sale to you. If you do not want us to use your Personal Information in this way or to disclose your Personal Information to third parties for marketing purposes, please click an unsubscribe link in your emails or contact us at <u>privacy@idealindustries.com</u>. You can object to direct marketing at any time and free of charge.

Legal Bases for Processing Your Personal Information

Below is a list of the purposes described in our Privacy Policy with the corresponding legal bases for processing.

Legal Bases for Processing: Based on our contract with you or to take steps at your request prior to entering into a contract.

- Section 4 To Provide You Our Services
- Section 4 To Provide Customer Support or Respond to You
- Section 4 For Internal Use
- Section 4 To Provide You with Service-Related Communications
- Section 4 To Enforce Compliance with Our Terms and Agreements or Policies
- Section 4 To Ensure the Security of the Services
- Section 5 a) Disclosure to Service Providers

Legal Bases for Processing: Based on your consent.

- Section 4 To Engage in Marketing, Advertising, and Promotional Activities
- Section 5 b) Parent Company, Affiliates, and Subsidiaries

Legal Bases for Processing: Based on our legal obligations.

- Section 4 To Ensure the Security of the Services
- Section 4 To Maintain Legal and Regulatory Compliance
- Section 4 To Comply with Legal Obligations
- Section 5 e) Law Enforcement, Regulators, and Other Parties for Legal Reasons

Legal Bases for Processing: To protect your vital interests.

• Section 4 – To Comply with Legal Obligations

Legal Bases for Processing: Based on our legitimate interests. When we process your personal data for our legitimate business interests, we always ensure that we consider and balance any potential impact on you and your rights.

- Section 4 For Internal Use
- Section 4 To Provide You with Service-Related Communications
- Section 4 To Provide Customer Support or Respond to You
- Section 5 b) Parent Company, Affiliates, and Subsidiaries
- Section 5 d) Third Parties in Connection with a Corporate Transaction

### Your Individual Rights

We provide you with the rights described below when you use our Services. We may limit your individual rights requests in the following ways: (a) where denial of access is required or authorized by law; (b) when granting access would have a negative impact on other's privacy; (c) to protect our rights and properties; and (d) where the request is frivolous or burdensome.

- **Right of Access.** Upon your request, we will provide you with a copy of your Personal Information in our files without undue delay and free of charge, unless we permitted by law to charge a fee.
- **Right to Rectification (or "Correction").** You may request to correct or update any of your Personal Information in our files. We may provide you with the ability to update some or all of your Personal Information directly via the Services.
- **Right to Erasure** (or the "Right to be Forgotten"). Upon your request, we will erase any of your Personal Information in our files that: is no longer necessary in relation to the

purposes for which it was collected or otherwise processed; was collected in relation to processing that you previously consented to, but later withdrew such consent; or was collected in relation to processing activities to which you object and there are no overriding legitimate grounds for our processing.

- **Right to Data Portability**. If we process your Personal Information based on a contract with you or based on your consent or the processing is carried out by automated means, you may request to receive your Personal Information in a structured, commonly used and machine-readable format, and to have us transfer your Personal Information directly to another controller, where technically feasible. Personal Information.
- **Automated Individual Decision-Making, Including Profiling.** You have the right not to be subject to a decision based solely on automated processing of your Personal Information, including profiling, under applicable law.
- **Right to Object to and Right to Restrict Processing**. Under certain situations, you may object to or seek to restrict our processing of your Personal Information.

## How to Submit a Request or Complaint

To exercise any of your rights above, or if you believe that we have infringed or violated your rights under this Privacy Policy, you may do so by completing our **Privacy Policy Submission Form**, emailing us at <u>privacy@idealindustries.com</u>, or calling us at (800) 435-0705. so that we can work with you to fulfill your request or resolve your concerns. Please note, we may seek to verify your identity when we receive an individual rights request from you in order to ensure the security of your Personal Information. When we fulfill your individual rights requests for correct (or rectification), erasure or restriction of processing, we will notify third parties also handling the relevant Personal Information unless this proves impossible or involves disproportionate effort. You can also complain about our processing of your Personal Information to the relevant data protection authority where you live or work, or in the place where the alleged breach of data protection law has taken place.

### International Transfers of Personal Information

Your Personal Information may be stored, processed, and transmitted in locations around the world, including locations outside of the country or jurisdiction where you are located, including the United States. Such countries or jurisdictions may have data protection laws that are different or less protective than the laws of the jurisdiction in which you reside.

Any Personal Information transferred is subject to appropriate safeguards as permitted under the applicable data protection laws. Specifically, when your Personal Information is transferred out of the EEA, we have the required contractual provisions for transferring Personal Information in place with the third parties to which your information is transferred. For such transfers, we rely on legal transfer mechanisms such as Adequacy Decisions, Binding Corporate Rules, Standard Contractual Clauses, or we work under international agreements and treaties with respect to data privacy and cross border transfers of Personal Information, as may be applicable.