

Privacy Notice of DWFritz Automation

DWFritz Automation (DWFritz) is committed to respecting your privacy. This Privacy Notice describes how we collect, use, and retain information or data provided to the Sales and Marketing teams, and to other DWFritz teams during the course of a contract with customers. Data Subjects in this notice refer to current and potential clients or individuals who express interest in DWFritz's products and/or services. This notice also describes our methods of collecting, using, maintaining, protecting, and disclosing that information.

This Privacy Notice applies to data we collect including:

- Via our website, email, social media platforms such as LinkedIn, text, and other electronic means between you and members of our Sales and Marketing team;
- At networking events, such as exhibitions and sales conferences;
- Through data transmitted online when requesting demos, information about products, services, and pricing; and
- From customers once a signed agreement with DWFritz has been initiated.

What Data Do We Collect?

Our Company may collect, use, and retain personal information, including, but not limited to:

- **Identity Data** such as first name, last name, and job title.
- **Contact Data** such as email addresses or telephone numbers.
- **Profile Data** such as company name, social media profiles and website analytics.

How is Data Collected?

We use different methods to collect personal data.

- **Direct Interaction** includes personal data provided to us by filling in forms, correspondence via email, telephone, mail, or otherwise. Some examples include:
 - Data you provide to DWFritz when filling out the contact form on our website or when registering for an event conducted or co-sponsored by the company such as a webinar, webcast, podcasts, private events such as product showcases, and lunch/dinners.
 - Emailing the company through professional websites such as LinkedIn.
 - Requesting information to be given to you regarding the Company and its product/services.
- **Third Parties** includes personal data collected from services such as ZoomInfo and industry conferences. From sources such as LinkedIn or D&B, DWFritz may collect company based information and cross-reference them with sources such as ZoomInfo.

Purpose of Processing: How we use your data

We will use personal data only as permitted by law, such as in the following circumstances:

- To find and communicate with potential clients;
- To secure new business for the Company;
- To provide information about the Company's product and services;
- To gather information to improve our services;
- To notify you about changes to our product and services; and
- To manage sales contracts.

Legal Basis for Processing

- **Legitimate Interest** means that the processing of personal data is a necessity in order to provide potential clients with information relating to the Company's product and/or services. Any impact on the Data Subjects is considered prior to processing. Note that we do not use personal data for activities that would otherwise conflict with the rights of the Data Subjects.
- **Performance of a Contract** means that the processing of personal data is necessary for Data Subjects who may be, or will be entering into a sales contract with Company.
- **Consent** means the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Who We Share Your Data With

Internally: Information collected from or provided by customers and potential clients may be accessed by various DWFritz's teams.

Internationally: Information collected from or provided by potential clients in the EU is shared with our headquarters in the United States. Your data may be shared with other vendors who are outside the European Economic Area.

Third Parties: Your data may also be shared with technology service providers who process personal data in the course of our business operations including, but not limited to; Ontraport, MailChimp, and Google Analytics, Salesforce, Einstein, and Epicor.

Legal Obligation: We may need to share your data when we believe it's required by law or to help protect the rights and safety of you, us or others.

It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you, (3) investigate and defend ourselves against any third-party claims or allegations, (4) protect the security or integrity of our Service; or (5) exercise or protect the rights and safety of DWFritz, our customers, personnel, or others. We attempt to notify Data Subjects about legal demands for their personal data when appropriate, at our discretion, unless prohibited by law or court order or when the request is an emergency.

Retention of Personal Data

DWFritz will retain your personal data for up to 4 Years, **or** as long as your account is active, your information is needed to provide you with our service, or as required to fulfill legal

obligations, resolve disputes, and enforce our agreements. Data Subjects who wish to delete their account may send a written request to DPO@DWFritz.com.

Data Subject Access Rights

If you have questions about the type of personal data we have, or if you want to modify, restrict, or delete your personal data, please reach out to the Data Protection Officer (DPO) using the contact information listed at the bottom of this document. Please note that transmission of the requested may take up to a month.

Data Subjects in the E.U. have the following rights which we would like to extend to all Data Subjects regardless of location:

Your Rights	What You Can Request
Right to Access	The right to be provided with a copy of your Personal Data. Note that a small fee may be charged for this service
Right to Rectification	The right to require us to correct incomplete or inaccurate Personal Data we have about you
Right to Erasure/To be Forgotten	The right to ask us to delete Personal Data when there is no legitimate reason for processing. If we are unable to comply with your request, we will notify you within 48 hours
Right to Restrict Processing	The right to require us to restrict Personal Data processing, where applicable.
Right to Request Data Portability	The right to request transfer of your Personal Data in a commonly used, machine-readable format.
Right to Object to Processing	The right to object to the processing of your Personal Data.
Right to Withdraw Consent at any Time	The right to withdraw your consent at any time in which we rely on your consent to process your Personal Data.

How We Protect Your Data

DWFritz adheres to the requirements laid out by the EU General Data Protection Regulation. DWFritz ensures that any personal data transferred to the U.S. is secured using ISO 27001 security protocols, which prescribe organizational policies, procedures, and practices that protect the confidentiality, integrity, and availability of data held by the organization. DWFritz also complies with GDPR privacy standards, including privacy by design.

DWFritz utilizes Standard Contractual Clauses approved by the European Commission as governance for any transfers of data out of the EU.

DWFritz ensures that any personal data transferred internationally is secured using SSL 256bit encryption via the website.

If you have any questions regarding personal data practices by DWFritz, please contact our Data Protection Officer below.

Contact the DPO

DWFritz commits to resolve complaints about our collection or use of your personal information. European Union individuals with inquiries or complaints regarding our policy should first contact DWFritz Automation at DPO@DWFritz.com. DWFritz commits to cooperate with the panel established by the EU data protection authorities (DPAs) and comply with the advice given by the panel with regard to marketing, sales, and customer data transferred from the EU.

Email Address	Mailing Address
DPO@DWFritz.com	<p>France: DWFritz Metrology SAS Attn: Data Protection Officer 3 Rue Emmanuel Philippot 35230 Saint-Erblon</p> <p>United States: DWFritz Automation, Inc. Attn: Data Protection Officer 9600 SW Boeckman Road Wilsonville, OR 97070 U.S.A.</p>

Underage Users

DWFritz does not intend to solicit or collect personal data from anyone under the age of 18. If you are under 18, do not enter information on this Site, or engage in our services. If you believe a minor, under the age of 18, has entered personal data information on our site, please contact us at DPO@DWFritz.com to have the data removed and to terminate the minor's account.

Changes in the Privacy Notice

DWFritz reserves the right to amend the Privacy Notice from time to time at its sole discretion, and will provide notice by email, or on the homepage of the Site, when we make material changes to this notice, prior to the change becoming effective.

Version History

Version	Date	Revision Author	Summary of Changes
1	06/02/2020	Laxman Rajagopalan	Develop stage 1 policy
2	07/02/2020	Laxman Rajagopalan	Develop stage 2 policy
3	08/26/2020	Laxman Rajagopalan	Added SCC clauses; removed privacy shield references