

KAB Seating Australian Privacy Policy.

PLEASE READ THIS PRIVACY POLICY CAREFULLY

1. OUR PRIVACY STATEMENT

The protection of your personal data and personal information is of great importance to **Commercial Vehicle Group, Inc. ("Company")** and its affiliates within and outside Australia (together, the "Company Group" or "we/us"). This privacy policy (the "Privacy Policy") therefore intends to inform you about how we collect, hold, process and disclose personal data.

We are a supplier of electrical wire harnesses, seating systems, and a full range of other cab related products for the global commercial vehicle markets.

We take all reasonable steps to implement and maintain practices, procedures and systems to ensure that we comply with all our obligations under the *Privacy Act 1988* (Cth) and the *Australian Privacy Principles (APPs)*.

We encourage you to read this Privacy Policy carefully. By accessing our website, purchasing our products/services or continuing to engage with us, you consent to your personal information being collected, held and used in this way and for any other use you authorise. We will only use your personal information for the purposes described in this Privacy Policy or otherwise with your express permission.

If you do not wish your personal data to be used by us as set out in this Privacy Policy, please do not provide us with your personal data. However, please note that if you do not provide us with your personal data in certain instances, we may not be able to engage you as a customer, supplier or employee; we may not be able to provide you with the full range or any of our services, you may not have access to and/or be able to use some features of the website, and your experience may be impacted. Under the Privacy Act, you generally have the option of not identifying yourself or of using a pseudonym when dealing with us, but not where this is impractical or where the law or a court order provides otherwise. It will generally be impractical for you to deal with us anonymously or under a pseudonym, should you wish to enter into a contract with us. The reason for this is because your identity is a relevant factor creating a legally binding arrangement. It is material to our decision of whether or not to enter into agreements with you. If you have any queries or comments relating to this Privacy Policy, please contact:

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KAB Seating Australia Pty. Ltd.
Attn: GDPR Compliance
7800 Walton Parkway, New Albany, OH 43054 USA
Australia.Sales@cvgrp.com

2. WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

The sort of information we collect and hold may include:

- your personal details such as your name, job title, email and/or physical addresses, telephone numbers and other contact information and demographic information (including the country you reside and industry you are involved in);
- your order number, customer reference number or loyalty identifier;
- how and when you access our site; and
- what, how and when you have engaged us.

The information we collect depends on the services that you buy, use or apply for.

Sensitive Information

If we need to collect and hold Sensitive Information (such as information relating to health, disability, ethnic origin, criminal convictions, religious or political affiliation), we will only do so where it is reasonably necessary to perform our functions and will seek your express written consent in advance. Collection of such Sensitive Information is done in accordance with the APPs.

3. HOW DO WE COLLECT YOUR PERSONAL DATA?

We collect information in a number of ways, including:

- directly from you when you provide information (such as an email address and personal details) by sending us a message, email, online request, phone or in documents. This may arise if/when:
 - you make an application or fill out forms for us;
 - you take part in our promotions, competitions, testimonials, surveys and focus groups;

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- you register or create an account with us; or
- you purchase products or services from us online.
- from our own records and from purchases that you have previously made or other interactions you have been involved in;
- when you visit our websites, social media pages or mobile applications or click on our advertisements on online media, which may provide us with information about your computer hardware or software (for example “cookies“).

Please also be aware that in some circumstances we may receive your personal information from others. This includes:

- from an organisation you are involved with (for example, if you are copied into an email by a colleague); and
- information collected and collated from publicly available sources, including search engines, websites, social media, publicly available data bases, third party sources and referees, personal contacts and industry connections.

Where we receive unsolicited personal information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we obtain directly from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

If you disclose personal information to us about someone else, you must ensure that you are authorised to disclose that information to us and that, without our taking any further steps required by applicable data protection or privacy laws, we may collect, use and disclose such information for the purposes described in this Policy.

4. HOW DO WE USE YOUR PERSONAL DATA?

We will always process and use your personal data in accordance with the APPs. We may collect and process your personal data for the purposes detailed below:

- (a) to conduct our business, including to respond to your queries, verify your identity, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us;
- (b) to perform and manage our relationship with employees and other staff as their employer and contractor, and to fulfil all regulatory obligations related to our employment or contractual relationship;

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- (c) to perform analytics of our products and services and provide you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and our selected business partners' products and services to you by post, email, SMS, phone and fax and, where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us through the "General Data Protection Enquiry" form below.
- (d) to analyse your personal information in order to better understand your and our other clients' services and marketing requirements, to better understand our business and develop our products and services;
- (e) to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud;
- (f) to notify you about changes to our services and products;
- (g) to ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers;
- (h) in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal information to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy.
- (i) We may process your personal information to comply with our legal and regulatory requirements or dialogue with regulators as applicable which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.
- (j) For any other purpose that is connected to or associated with those outlined above.

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Please be aware that, where we process your personal data based on your consent, you are entitled to withdraw your consent at any time.

We will process your data for these specified, explicit and legitimate purposes, and will not further process the data in a way that is incompatible with these purposes. If we intend to process personal data originally collected for one purpose in order to attain other objectives or purposes, we will ensure that you are informed of this. We will keep your personal data for the time permitted by the Privacy Act.

5. HOW DO WE HOLD PERSONAL DATA?

Personal information we hold is stored on our web servers in secure environments. These servers may be operated by us or by our service providers (including those who may be located overseas).

In order to prevent unauthorised access or disclosure, we have in place numerous policies designed to protect physical and electronic information. These policies ensure records stay secure and information is only accessible on a “need-to-know” basis. Employees who do need to use data are trained in data protection and contractually obliged to confidentiality.

6. HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with Company Group entities and with third parties in accordance with the APPs and for the reasons outlined above. Where we share your data with a third party, we will put appropriate arrangements in place. Furthermore, where we share your data with any entity outside Australia (which will likely be to the United States or a country within the European Union), we will take appropriate steps to ensure data handling and security arrangements are in place in line with the APPs.

Strategic Partners

Subject to your prior consent, your personal data may be transferred to, stored, and further processed by strategic partners that work with us to provide our products and services or help us market to customers. Your personal data will only be shared by us with these companies in order to provide or improve our products and services.

Service Providers

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We share your personal data with companies which provide services on our behalf, such as hosting, maintenance, support services, email services, marketing, auditing, fulfilling your orders, processing payments, data analytics, providing customer service, and conducting customer research and satisfaction surveys.

Corporate Affiliates and Corporate Business Transactions

We may share your personal data with all Company's affiliates. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal data to the relevant third party.

Legal Compliance and Security

It may be necessary for us - by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence - to disclose your personal data. We may also disclose your personal data if we determine that, due to purposes of national security, law enforcement, or other issues of public importance, the disclosure is necessary or appropriate.

We may also disclose your personal data if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

Data Transfers

Such disclosures may involve transferring your personal data out of Australia. For each of these transfers, we make sure that we take reasonable steps to make sure that the recipient complies with the APPs.

We will not use your personal data for online marketing purposes unless you have expressly consented to such use of your personal data. You can change your marketing preferences at any time [by contacting us as detailed below](#).

7. HOW DO WE PROTECT YOUR PERSONAL DATA?

We process your personal data in a manner that ensures their appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage. We use appropriate technical or

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organisational measures to achieve this level of protection. However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that your information will be secure at all times. Transmission of personal information over the Internet is at your own risk and you should only enter, or instruct the entering of, personal information within a secure environment.

We encourage you to play an important role in keeping your personal information secure, by maintaining the confidentiality of any passwords and account details used on our websites. It is your sole responsibility to maintain such confidentiality and we will not be liable for any damage, loss or expense suffered because a password or account details has fallen into the wrong hands.

We will retain your personal information for as long as it is necessary to fulfill the purposes outlined in this Privacy Policy, unless a longer retention period is required or permitted by law.

8. DATA BREACHES

We are aware of and will comply with the Mandatory Data Breach reporting obligations as set out in the Privacy Act. Please let us know if you would like to learn more about what steps must be taken when a data breach has been identified.

9. ACCESSING YOUR PERSONAL INFORMATION

You have the right to request access to the personal information we hold about you by contacting us by one of the methods listed at the end of this Privacy Policy. You also have the right to request that your personal information is corrected. There is no fee for making such requests and we will endeavour to make your information available within 30 days of the initial request. We reserve the right to confirm your identity before providing you with this information.

We take reasonable precautions to ensure that the personal information we collect and use is complete, relevant and up -to-date. However, the accuracy of the personal information we receive depends to a large extent on the information you provide.

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10. CHILDREN

Our products and services are intended for adult customers. Thus, generally we do not knowingly collect and process information on children under fifteen (15). If we discover that we have collected and processed the personal data of a child under fifteen (15), or the equivalent minimum age depending on the concerned jurisdiction, we will take steps to delete the information as soon as possible. If you become aware that a child under fifteen (15) has provided us with personal data, please contact us immediately by using the contact address specified under this Privacy Policy.

11. UPDATES TO PRIVACY POLICY

We may revise or update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy via the Services. If we make changes which we believe are significant, we will inform you through the Website to the extent possible and seek your consent where applicable.

12. MAKING A COMPLAINT

If you have a concern about your privacy, you have a right to make a complaint and we'll do everything we can to put matters right.

To lodge a complaint, please get in touch with us using the contact details provided below. We will review your complaint and endeavour to resolve it immediately.

Australia.Sales@cvgrp.com

We acknowledge every complaint we receive and provide contact details of the investigating officer. We keep you updated on the progress we're making towards resolving your issue.

Usually, it takes only a few days to resolve a complaint. However, if we're unable to provide a final response within 30 days, we'll contact you to explain why and discuss a timeframe to resolve the complaint.

If you are not satisfied with our response, you may lodge a complaint with the OAIC. The contact details of the OAIC are:

Office of the Australian Information Commissioner

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GPO Box 2999 Canberra ACT 2601

Telephone: 1300 363 992

Website: www.oaic.gov.au

Email: enquiries@oaic.gov.au

13. GDPR

We recognise and acknowledge the European Union's General Data Protection Regulation ('GDPR'). We are committed to providing a consistent approach to data protection and ensuring the security and protection of personal information and, insofar as the GDPR applies to our operations in Australia, we will act in accordance with the requirements of the GDPR.

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