

## Global Website Privacy Notice

Last update: May 2018

At Hager, we respect your privacy and we want to be transparent about the types of personal information we collect about you and how we use it. In this Website Privacy Notice (hereafter the "**Notice**"), we explain who we are, how we collect, share and use personal information we obtain from you when you visit a web platform (hereafter the "**Website**"), and how you can exercise your privacy rights.

Please note that this Notice describes the collection of personal information that takes place generally on all Hager websites and the specific processing activities that take place on each Hager websites may be different. Therefore, some of the processing activities described in this Notice might not apply to the particular Hager website that you are visiting.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Notice.

The Website that you are visiting is managed by the local Hager affiliate (hereafter "**Hager**"), who is the data controller for all personal information that is collected via a Website.

### **1. Quick links**

We recommend that you read this Notice in full to ensure you are fully informed. However, if you only want to access a particular section of this Notice, then you can click on the relevant link below to jump to that section.

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### **2. What personal information we collect and why**

We collect various types of personal information on our Website. The personal information that we may collect about you broadly falls into the following categories:

- [Information that you provide voluntarily](#)

Certain parts of our Website may ask you to provide personal information voluntarily, including:



- your contact details: such as first and last name, date of birth, address, phone number, e-mail address, gender;
- details about the **products/services** you are using or interested in;
- credit card details;
- business contact details, including your business affiliation;
- CVs and job applications for online recruitment purposes.

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

- *Information that we collect automatically*

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, preferences, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our [Cookie Notice](#).

- *Information that we obtain indirectly from third parties*

From time to time, we may receive personal information about you that we obtain from other sources (for example: installers when they create an account on your behalf on one of our Websites).

The types of information we collect from third parties may include: email address, details about your existing installation, etc. We use this information to maintain and improve the accuracy of the records we hold about you, to provide technical assistance for the setting-up or maintenance of our solutions and to manage our customer account relationship with you.

### **3. For what purposes we use your personal information**

We use the personal information we collect from you for the following purposes:

- to create your account on our Website;

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- to communicate efficiently with you and to answer any questions or queries you may have;
- to manage your online purchases on our Website;
- to administer and monitor the stability and performance of our Website in order to improve it;
- to ensure the content on our Website is relevant to you and is presented in the most effective manner for you;
- to send you information or promotions on our products and proposed services;
- to subscribe you to our newsletter;
- to send you personalized advertisements that we think may interest you based on your preferences and your use of our Website;
- to notify you when updates of our Website are available and of changes to any products or services we offer or provide through it;
- to understand your preferences and improve your experience and customer satisfaction when you visit our Website and our services;
- to carry out statistical analyses on the use of this Website and visit frequency; and
- for online recruitment purposes (please read the Jobs Application Privacy Notice that is available on our Website).

We will use the personal information we collect from you only for the purposes described in this Notice or for purposes that we explain to you at the time we collect your personal information.

#### **4. Who we share your personal information with**

We may disclose your personal information to the following categories of recipients:

- to **Hager affiliates, third party service providers and partners** who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our Website), or who otherwise process personal information for purposes that are described in this Notice or notified to you when we collect your personal information;
- to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe such disclosure is necessary (i) as a matter of complying with applicable laws or regulations, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
- to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Notice;
- to any **other person with your consent** to the disclosure.

## **5. On what legal basis we process your personal information**

We will process the personal information collected on our Website based on the necessity to manage our relationship with you, based on our legitimate interests which will depend on the personal information concerned and the specific context in which we collect it, or based on your consent.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

## **6. Transfers of personal information outside the EU/EEA**

We operate at a global level and, as a result, your personal information may be transferred to, and processed in, countries other than the country in which you are resident. In some cases, these countries may be located outside the European Union / European Economic Area (**EU/EEA**) and therefore may have data protection laws that are different to the laws of your country of residence.

Specifically, our Website servers are located in the EU/EEA, but we may share or give access to your personal information to Hager affiliates, third party service providers and partners who may be operating outside the EU/EEA (for example, we may use web hosting providers or cloud computing service providers who store or access your personal information outside the EU/EEA).

Where that is the case, we make sure that your personal information is transferred to third countries outside the EU/EEA that are deemed "adequate" by the European Commission (a list of adequate countries is available here [\[link\]](#)), or alternatively, where your personal information is not sent to a country that provides adequate protection, we will put in place appropriate safeguards to guarantee that your personal information remains protected while it is being processed outside the EU/EEA in accordance with applicable privacy laws. These appropriate safeguards may include signing the European Commission's Standard Contractual Clauses with the Hager affiliate, third party service provider or partner outside the EU/EEA with whom we share your personal information. For further information about transfers of personal information outside the EU/EEA, please refer to the "How to contact us" section below.

## **7. How long we store your personal information**

We will retain your personal information for as long as necessary to enable us to fulfil the purposes described in this Notice and where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested).



Once the purpose for processing your personal information no longer exists, or the period of retention has expired, or if you ask us to delete your personal information, we may continue to store your personal information for a limited period of time if necessary to comply with applicable legal, tax or accounting requirements.

When we no longer have a purpose to process your personal information, we will make sure your personal information is either deleted or anonymised.

## 8. How we protect your personal information

We are committed to ensuring the security of your personal information. We utilize robust precautions to protect the confidentiality and security of the personal information within our Website, by employing technological, physical and administrative security safeguards, such as firewalls and carefully developed security procedures, for example, when you enter confidential information (such as login credentials or information submitted from within the Website). We encrypt the transmission of that information using secure socket layer technology (SSL). These technologies, procedures and other measures are used in an effort to ensure that your personal information remains safe, secure, and only available to you and to those you authorized to access your personal information. However, no internet, e-mail or other electronic transmission is ever fully secure or error free, so you should take care in deciding what information you send to us in this way.

## 9. Minors

The services we provide on this Website are not intended for individuals below the age of 18. If you are under 18, please do not provide your personal information on this Website.

## 10. What data protection rights you have and how you can exercise them

You have the following data protection rights:

- You may request **access** to and obtain a copy of your personal information.
- You may also request that any personal information that is inaccurate or incomplete be **rectified** or **completed**.
- You may request that your personal information be **erased** under certain legal conditions (for example, where the personal information is no longer needed to achieve the purposes for which the information was initially collected).
- In addition, you may **object to the processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information under certain legal conditions.
- You have the right to **opt-out of electronic marketing communications** we send you at any time and free of charge. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of



other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading below.

- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).

You may exercise any of the rights above at any time by contacting us as described under the “How to contact us” section below. We will respond to your request in accordance with applicable data protection laws.

## 11. External links

If any part of our Website provides links to third party websites, those websites do not operate under this Notice. We are not responsible for the online collection on third parties' websites and we recommend you examine the privacy notices posted on those websites to understand their procedures for collecting, using and disclosing personal information.

## 12. Updates to this Notice

We may update this Privacy Notice in response to changing legal, technical or business developments and where that is the case, we will provide an updated version of this Privacy Notice on our Website.

You can see when this Privacy Notice was last updated by checking the “last update” date displayed at the top of this Privacy Notice.

## 13. How to contact us

If you have any questions, concerns or complaints about this Notice, or the way we process your personal information, or if you want to exercise your rights as described above, please use this [request form](#).

If you are a customer of Hager, please also note our [Global Customer Privacy Policy](#).