

ITW Welding Products Group (FZE)

Jebel Ali Free Zone – United Arab Emirates

Tel. +971 4 255 91 94, P.O Box 16774

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ص.ب: 16774

هاتف: +971 4 255 91 94



DATA PROTECTION NOTICE

This Data Protection Notice (“Notice”) sets out the basis which ITW Welding Products Group FZE (“ITW”, “we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our customers in accordance with relevant personal data protection regulations in the United Arab Emirates. This Notice applies to personal data in our possession or under our control, including personal data in the possession of organizations which we have engaged to collect, use, disclose or process personal data for our purposes.

This Notice describes how we manage your personal information and respect your privacy. If you have any questions, concerns, or requests about this privacy notice, how we manage your Personal Information, or any other issue relating to your Personal Information, you may contact us at:

ATTENTION: DATA PROTECTION OFFICER

Mailing Address: S3 A2SR10 Jebel Ali Free Zone United Arab Emirates

Telephone: +971 4 299 66 21

Email: Natalia.sabirzianova@itwwelding.com

PERSONAL DATA

1. As used in this Notice:

“customer” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and “personal data” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access. All **“Personal Data”** (which is defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains) that we collect and maintain will be subject to this Notice, as amended from time to time.

Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as voluntary. If you do not provide the mandatory data with respect to a particular activity, you will not be able to engage in that activity.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include your name and identification information such as your tax number, contact information such as your address, email address or telephone number,

nationality, gender, date of birth, marital status, photographs and other audio-visual information, employment information and financial information such as credit card numbers, debit card numbers or bank account information.

3. We may collect and process the following Information about you:

- a. Information that you provide by filling in our forms, including information provided at the time of registering to use our online platform and other co- registrations (e.g. social media logins), subscribing to our services, posting material or requesting further services;
- b. the information you provide when you avail our services;
- c. information you provide us, or that we may collect from you, when you report a problem with our services;
- d. a record of correspondence if you contact us;
- e. general, aggregated, demographic and non-personal information;
- f. if you download or use our mobile application, we may have access to details about your location and your mobile device, including a unique identifier for your device;
- g. details of transactions you carry out through our platforms and of the fulfilment of your orders;
- h. details about your computer, including but not limited to your IP address, operating system and browser type, as well as information about your general internet usage (e.g. by using technology that stores information on or gains access to your device, such as cookies, tracking pixels, web beacons, etc.);
- i. your email address from a third party if you indicate that you have consented to that third party sharing your information with us; and
- j. any other information we consider necessary to enhance your experience when availing our services or using our platforms.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorized by you to disclose your personal data to us (your “authorized representative”) after (i) you (or your authorized representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorized representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by relevant laws or regulations. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorized by law).

5. We may collect and use your personal data for any or all of the following purposes:
- a. performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - b. verifying your identity;
 - c. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - d. managing your relationship with us;

- e. processing payment or credit transactions;
- f. sending your marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;
- g. complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- h. any other purposes for which you have provided the information;
- i. transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in United Arab Emirates or abroad, for the aforementioned purposes;
- j. to answer any queries which you may send to us by email or other forms of communication, and we may keep a record of these contacts including call recordings (to the extent permitted by applicable law);
- k. in order to conduct customer satisfaction surveys and improve the products and services we offer or create new products and services;
- l. to meet our legal compliance obligations or for accounting or audit purposes, including the prevention of fraud for online payments and use of loyalty schemes;
- m. to protect our property, rights, and interests as well as the property, rights, and interests of other persons;
- n. for legal purposes, such as to respond to a valid legal subpoena or regulatory order;
- o. for credit checking and credit scoring purposes;
- p. for crime prevention and detection; and
- q. any other incidental business purposes related to or in connection with the above.

6. We share your information only as described below and with businesses that follow practices at least as protective as those described in this Notice:

- a. To offer you our services, we may engage with businesses who are affiliates of us and/or non-affiliated service providers (e.g. logistics businesses used to deliver products to you, marketing companies, payments processors to process online transactions, etc.). We may involve other businesses in your transactions, who may store your Information in a digital wallet to make your use of our services more efficient. You understand that it is important that such businesses have access to the relevant information to perform their functions. We will ensure that these businesses do not use your Information for other purposes. We may also receive Information from these business (e.g. updated delivery and address information), which we may use (e.g. to correct our records and deliver your next purchase). By using our platform, you hereby freely and specifically consent to the transfer, storage, use, and disclosure of your information among businesses who are affiliates of us and/or non-affiliated service providers, wherever located. These businesses shall be contractually bound to respect the confidentiality of your information.
- b. We may also use your Information to provide you with information about goods and services which may be of interest to you and enhance your Platform experience,

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- c. service messages, new features, enhancements, special offers and events of interest. We may contact you via various channels, including without limitation emails, push notifications, web notifications, post, telephone, in-app messages and news feed cards. We may permit third parties to use your Information. For example, we may provide advertisers information to help them reach the kind of audience they want to target and to enable us to comply with our commitments to our advertisers (e.g. by displaying their advertisements to a target audience).
- d. In the event that we or substantially all of our assets are acquired, customer information will be one of the transferred assets.
- e. We release account and other information when we believe such a release is appropriate to comply with the law and law enforcement investigations and to protect the rights, property or safety of our users or others. This includes exchanging information with other companies and organizations for various reasons, such as fraud protection and credit risk reduction.
- f. where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you;
- g. to third party service providers, agents and other organizations we have engaged to perform any of the functions listed above for us.

7. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

WITHDRAWING YOUR CONSENT

8. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email to Natalia.sabirzianova@itwwelding.com.

9. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

10. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us via email to Natalia.sabirzianova@itwwelding.com.

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11. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request via email to Natalia.sabirzianova@itwwelding.com.

13. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

14. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under relevant regulations).

PROTECTION OF PERSONAL DATA

15. To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorized third party service providers and agents only on a need-to-know basis.

16. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

17. All personal information you provide on our website is transmitted using SSL (Secure Socket Layer) encryption. SSL is a proven coding system that lets your browser automatically encrypt, or scramble, data before you send it to us.

18. Whenever our website links to any third-party websites, you must be aware that you are entering a domain over which we have no control over. In such cases, we encourage you to read the privacy statements of such third-party websites before you embark on purchasing any of their services.

ACCURACY OF PERSONAL DATA

19. We generally rely on personal data provided by you (or your Authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing us via email at Natalia.sabirzianova@itwwelding.com

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RETENTION OF PERSONAL DATA

20. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

21. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

STORAGE OF DATA

22. The information that we collect from you may be transferred to, and stored at, a destination outside of the United Arab Emirates. It may also be processed by staff operating outside the United Arab Emirates who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. We will store your Information for as long as necessary to fulfil the purposes indicated in this Notice or as otherwise permitted or required by law. Your Information may be transferred, stored, processed and used by our affiliated companies and/or non-affiliated service providers in one or more countries outside your originating country. Your payment details may be transferred to and stored with our affiliated companies in order to, among other things, process your payment details and provide support services to you.

EFFECT OF NOTICE AND CHANGES TO NOTICE

23. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

24. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

ACKNOWLEDGEMENT AND CONSENT

I acknowledge that I have read and understood the above Data Protection Notice, and consent to the collection, use and disclosure of my personal data by ITW for the purposes set out in the Notice.

Please tick the relevant boxes below if you agree to receive the following marketing materials:

- I do not wish to receive any marketing information.
- I would like to receive information about the goods and services which may be provided by ITW, including (but not limited to) offers, promotions and information about new goods and services, via the following channels:
 - newsletter
 - email
 - text message
 - telephone call

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For more information, kindly refer to follow sources available in UAE.

Country	Name of Law
United Arab Emirates	Federal Law No. (1) of 2006 on Electronic Commerce and Transactions Federal Decree-Law no. (5) of 2012 on Combating Cyber Crimes

Name and Signature: Natalia Sabirzianova

Date: 9th September , 2021