



## **PRIVACY POLICY**

This Privacy Policy (the “Privacy Policy”) describes the personal information the Wencor Group, LLC and its subsidiaries (the “**Company**” or “**we**”) collect, both online and offline through our interactions with you, and through the purchase of our products or the use of our services, including this website (located at <https://www.wencor.com/>), and how we collect, process, use and disclose such information and the rights and choices available to you to control such use. This Privacy Policy does not apply to personal information collected, used or disclosed about current and prospective Company employees, which is covered under a separate policy.

If you are a resident of the State of California, please see below the section entitled “Rights Under the California Consumer Privacy Act (CCPA)”

If the EU Regulation (EU) No. 2016/679 (“GDPR”) or the UK GDPR as defined in the Data Protection Act 2018 (“UK GDPR”) applies to our processing of your personal information, please see below the section entitled “European Data Protection Specific Information” for additional information regarding our collection and processing of your personal information.

For the purposes of this Privacy Policy, “personal information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household, as well as any other information related to a particular individual that constitutes “personal information” or “personal data” under applicable privacy or data protection laws.

### **Collection of Personal Information and Sensitive Personal Information**

The list below describes the categories of personal information we have collected from consumers and other individuals in the last 12 months. For each category of information, the categories of third parties to whom we have disclosed, sold, or shared such information within the last 12 months are referenced by a letter that coincides with the letter in the list of categories of service providers and third parties set forth below under “We may disclose your personal information to the following categories of service providers or third parties”.

Category	Examples	Disclosed in Last 12 Months to
Identifiers	Your name, job title, company name, company postal or mailing address, company email address, company phone number, any information you may provide to us at an event or in person, username and password for Company accounts.	A, B, C, D, E, F

Financial Account Information	Bank account number, credit card number, debit card number, shipping provider account information.	A, B, C, E, F
Commercial Information	Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	B, C, E, F
Device Information and Identifiers	IP address, cookie IDs, browser type and language, operating system, platform type, device type	E, F
Audio, Electronic, and Visual Information	Audio recordings of a customer service call or video footage when recorded or captured in surveillance camera footage if you visit one of our facilities.	E, F
Geolocation Data	IP address of device used to access our website.	E, F

**Of the above categories of personal information, the following are categories of sensitive personal information we may collect or have collected in the last 12 months from or about consumers:**

1. Certain Identifiers
2. Financial Account Information

**We may collect your personal information from the following sources:**

- You (including when you voluntarily submit information in connection with registering as a customer or purchasing our products or using our services, or when you email or call us with questions or issues).
- Company systems, networks, software applications, and databases you log into or use (including in connection with your use of our website), including from vendors the Company engages to manage or host such systems, networks, applications or databases.
- Surveillance cameras at our physical locations when you visit our locations.
- Our employees, contractors, vendors, suppliers, guests, visitors, and other customers based on your interactions with them.

**We may disclose your personal information to the following categories of service providers or third parties:**

- A. Financial institutions
- B. Credit card processors
- C. Government agencies
- D. Consulting and investigation firms
- E. IT, cybersecurity, and privacy vendors and consultants
- F. Opposing parties, courts or tribunals in legal proceedings

By referring to the letter corresponding to the category, the above table specifies to what categories of service providers and third parties we disclose, and in the last 12 months have disclosed, personal information.

**We may collect and use your personal information for one or more of the following business or commercial purposes:**

1. To fulfill or meet the purpose for which you provided the information.
2. To provide you with information, products or services that you request from us, including to provide and operate our website.
3. To comply with local, state, and federal law and regulations, including export control regulations.
4. To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
5. To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
6. As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
7. To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations, or for other legal or regulatory purposes.
8. As described to you when collecting your personal information.
9. To evaluate, assess, and manage the Company’s business relationship with vendors, service providers, and contractors that provide services to the Company.
10. To improve user experience on Company computers, networks, devices, software applications or systems, and to debug, identify, and repair errors that impair existing intended functionality of our systems.
11. To detect security incidents involving potentially unauthorized access to and/or disclosure of personal information or other confidential information, including proprietary or trade secret information and third- party information that the Company receives under conditions of confidentiality or subject to privacy rights.
12. To protect against malicious or illegal activity and prosecute those responsible.
13. To prevent identity theft.
14. To verify and respond to consumer requests under applicable consumer privacy laws.

**Disclosure of Personal Information**

We have disclosed in the last 12 months personal information for all of the above business or commercial purposes.

We do NOT and will not “sell” or “share” (and in the last 12 months have not sold or shared) your personal information, as such terms are defined in the CCPA.

We do NOT and will not use or disclose your sensitive personal information for purposes other than those specified in the CCPA.

In the ordinary course of our business, we do not collect, receive or otherwise process any personal information that can be considered “Special Category Data” under the GDPR.

## **Retention of Personal Information**

We will retain each category of personal information for the length of time needed to fulfill the purposes outlined in this Privacy Policy, including providing you the products and services you have requested, unless a longer retention period is required or permitted by law. In deciding how long to retain each category of personal information that we collect, we consider many criteria, including, but not limited to: the business purposes for which the personal information was collected; relevant federal, state and local recordkeeping laws; applicable statute of limitations for claims to which the information may be relevant; and legal preservation of evidence obligations.

## **Business Transfers**

We may transfer personal data to third parties, their representatives and other relevant participants in, or during negotiations of, any actual or prospective sale, merger, acquisition, restructuring, or change in control involving all or a portion of our business or assets, including in connection with bankruptcy or similar proceedings.

## **Compliance With Law and Safety**

We may disclose specific personal information and/or sensitive personal information based on a good faith belief that such disclosure is necessary to comply with or conform to the law or that such disclosure is necessary to protect our employees or the public.

## **Passwords**

The record created through your registration of an account on our website only be accessed with the unique password associated with those records. To protect the integrity of the information contained in those records, you should not disclose or otherwise reveal your passwords to third parties.

## **Children’s Privacy**

We do not knowingly collect, sell or share the personal information of anyone under the age of 16.

## **How We Protect the Information That We Collect**

The protection of the information that we collect about consumers is of the utmost importance to us and we take reasonable measures designed to ensure that protection, including:

- We use commercially reasonable tools and techniques to protect against unauthorized access to our systems.
- We restrict access to private information to those who need such access in the course of their duties for us.

## **Rights Under the California Consumer Privacy Act (CCPA)**

This section of the Privacy Policy applies only to California residents. If you are a California resident, personal information, as used herein, *does not* include information that is “publicly available”, “de-identified” or “aggregate consumer information”, as such terms are defined in the CCPA.

Additionally, you have the following rights pursuant to the California Consumer Privacy Act (CCPA):

1. **Right to Know.** The right to request that we identify to you (1) the categories of personal information we have collected, shared or sold about you, (2) the categories of sources from which the personal information was collected, (3) the business purpose for which we use this information, and (4) the categories of third parties with whom we disclose or have disclosed your personal information for a business purpose;
2. **Right to Access.** The right to request that we provide you access to or disclose to you the specific pieces of personal information we have collected about you;
3. **Right to Delete.** The right to request that we delete personal information that we have collected from you, subject to certain exceptions;
4. **Right to Correct.** The right to request that we correct inaccurate personal information (to the extent such an inaccuracy exists) that we maintain about you;
5. The right to designate an authorized agent to submit one of the above requests on your behalf. See below for how you can designate an authorized agent; and
6. The right to not be discriminated or retaliated against for exercising any of the above rights.

**You Can Submit Any of the Above Types of Requests by Any of the 2 Options Below:**

1. Email us at [privacy@wencor.com](mailto:privacy@wencor.com)
2. Call our toll-free number at 1-888-245-1870 ext. 100025.

## **How We Will Verify That it is Really You Submitting the Request:**

If you are a California resident, when you submit a Right to Know, Right to Access, Right to Delete, or Right to Correct request through one of the methods provided above, we will ask you to provide some information in order to verify your identity and respond to your request. Specifically, we will ask you to verify information that can be used to link your identity to particular information in our possession, which depends on the nature of your relationship and interaction with us.

## **Responding to your Right to Know, Right to Access, Right to Delete, and Right to Correct Requests**

Upon receiving a verifiable request from a California resident, we will confirm receipt of the request no later than 10 business days after receiving it. We endeavor to respond to a verifiable request within forty-five (45) calendar days of its receipt. If we require more time (up to an additional 45 calendar days, or 90 calendar days total from the date we receive your request), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For a request to correct inaccurate personal information, we will accept, review, and consider any documentation that you provide, and we may require that you provide documentation to rebut our own documentation that the personal information is accurate. You should make a good-faith effort to provide us with all necessarily information at the time that you make the request to correct. We may deny a request to correct if we have a good-faith, reasonable, and documented belief that a request to correct is fraudulent or abusive. If we deny your request to correct, we shall inform you of our decision not to comply and provide an explanation as to why we believe the request is fraudulent.

### **If You Have an Authorized Agent:**

If you are a California resident, you can authorize someone else as an authorized agent who can submit a request on your behalf. To do so, you must either (a) execute a valid, verifiable, and notarized power of attorney, or (b) provide other written, signed authorization that we can then verify. When we receive a request submitted on your behalf by an authorized agent who does not have a power of attorney, that person will be asked to provide written proof that they have your permission to act on your behalf. We will also contact you and ask you for information to verify your own identity directly and not through your authorized agent. We may deny a request from an authorized agent if the agent does not provide your signed permission demonstrating that they have been authorized by you to act on your behalf.

## **European Data Protection Specific Information**

The following disclosures apply solely with respect to our processing activities that are subject to the GDPR or the UK GDPR.

The definition of “personal information” as used herein, does not include de-identified or aggregated information.

### **Data controller**

The data controller in respect of your personal information is:

- Where you are an employee or a representative of one of our customers (including prospective customers) or business partners (including suppliers), the data controller is generally the Wencor company that you are communicating with or that has the business relationship with that customer or partner. This can include Aftermarket Spares & Services Ltd., which is our Wencor group company established in the United Kingdom,;
- Where you are visiting our website, the Wencor company that is acting as the data controller is Wencor, LLC.

Please contact us if you would like to receive information on contact details or if you do not fall into one of the two categories of individuals listed above.

### **Legal Basis for Processing Personal Data**

Depending on the specific personal information concerned and the factual context, when we process personal information, we rely on the following legal bases as applicable:

- As necessary for our contract: When we enter into a contract directly with you, we process your personal information on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage the contract (i.e., providing our products and services to you, as

well as facilitating and processing payments, communicating with you about our website, complying with contractual obligations, and related administration). Where we are relying on this legal basis, we may not be able to provide you with all services if we do not process your personal information;

- Based on your consent: Where required by law we rely on your prior consent in order to carry out marketing or use certain types of cookies or similar technologies. You have the right to withdraw your consent at any time;
- As necessary to comply with our legal obligations: We process your personal information to comply with the legal obligations to which we are subject. This may include detecting, investigating, preventing, and stopping fraudulent, harmful, unauthorized, or illegal activity and includes compliance with applicable data protection laws;
- As necessary for our (or others') legitimate interests: We process your personal information based on such legitimate interests to (i) enter and perform the contract with your company or employer; (ii) develop, test, and improve our products and services; (iii) ensure authentication, integrity, security, and safety of our products and services, including detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal; and (iv) comply with non-EU and non-UK laws, regulations, codes of practice, guidelines, or rules applicable to us and respond to requests from, and other communications with, competent non-EU and non-UK public, governmental, judicial, or other regulatory authorities, as well as meet our corporate and social responsibility commitments, protect our rights and property and the ones of our customers, resolve disputes, and enforce agreements. If we do not process your personal information for these purposes, we may not be able to perform activities that are necessary for our legitimate interests, and, depending on the circumstances, provide you with our products and services.

## Data Subjects Rights

Your rights in relation to your personal information processed by us as a controller specifically include:

- Right of access and/or portability: You have the right to access any personal information that we hold about you and, in some circumstances, have that data provided to you or transfer that data to another provider;
- Right of erasure: In certain circumstances, you have the right to the erasure of personal information that we hold about you (for example, if it is no longer necessary for the purposes for which it was originally collected);
- Right to object to processing: In certain circumstances, you have the right to request that we stop processing your personal information;
- Right to rectification: You have the right to require us to correct any inaccurate or incomplete personal information;
- Right to restrict processing: You have the right to request that we restrict processing of your personal information in certain circumstances (for example, where you believe that the personal information we hold about you is not accurate or lawfully held).

To exercise your rights or if you have any other questions about our use of your personal information, please contact us. Contact details are provided below. Please note that we may request you to provide us with additional information in order to confirm your identity and ensure that you are entitled to exercise your rights.

You also have the right to withdraw any consent you may have given to us. Finally you also have the right to lodge a complaint to a data protection authority. For more information, please contact your local data protection authority.

### **Automated Decision Making**

We do not carry out any processing activity that involves automated decision making, including profiling.

### **International Data Transfers**

We may transfer, store (for example, in a data center), and process personal information outside of the country or region where it was initially collected, including in countries outside of the European Economic Area (“EEA”) and the UK. Such countries may have data protection rules that are different and less protective than those of your country. Where personal information of users in the EEA or the UK is being transferred to a recipient located in a country outside the EEA or the UK which has not been recognized as having an adequate level of data protection, we will take all appropriate steps to ensure that our customers (and other third parties from whom we receive personal information) can transfer such information to us in compliance with the EEA and UK data protection laws. These could include entering into the European Commission’s standard contractual clauses with those customers or third parties under Article 46(2) of the GDPR. Please contact us to request further information in that respect. Where relevant and permissible under the applicable data protection law, one of the derogations (for example, under Article 49 of the GDPR) may also be relied upon to legitimize transfer of personal information.

### **Changes to Our Privacy Policy**

As our services evolve and we perceive the need or desirability of using personal information collected in other ways, we may from time to time amend this Privacy Policy. We encourage you to check this page frequently to see the current Privacy Policy in effect and any changes that may have been made to them. If we make material changes to this Privacy Policy, we will post the revised Privacy Policy and the revised effective date on the same webpage. Please check back here periodically.

### **Individuals With Disabilities**

This Privacy Policy is in a form that is or will be made accessible to individuals with disabilities.

### **How to Contact Us**

If you have any questions about this Privacy Policy or any complaints about our processing of your personal information, please contact us at [privacy@wencor.com](mailto:privacy@wencor.com).

***\*\*This Privacy Policy was last updated June 21, 2023.***