

BBS Automation Chicago, Inc. ("BAUS," "we," "us," or "our") complies with the EU-U.S. Data Privacy Framework (EU-U.S. DPF) and the UK Extension to the EU-U.S. DPF as set forth by the U.S. Department of Commerce. BAUS has certified to the U.S. Department of Commerce that it adheres to the EU-U.S. Data Privacy Framework Principles (DPF Principles) with regard to the processing of personal data received from the European Union in reliance on the EU-U.S. DPF and from the United Kingdom in reliance on the UK Extension to the EU-U.S. DPF. If there is any conflict between the terms in this privacy policy and the DPF Principles, the Principles shall govern. To learn more about the Data Privacy Framework Program (DPF Program), and to view our certification, please visit <https://www.dataprivacyframework.gov/>.

A. DEFINITIONS

"Data Subject" means the individual to whom any given Personal Data covered by this DPF Policy refers.

"Personal Data" means any information relating to an individual residing in the European Union, European Economic Area, the United Kingdom (including Gibraltar), and Switzerland that can be used to identify that individual either on its own or in combination with other readily available data.

"Sensitive Personal Data" means Personal Data specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or information specifying the sex life of an individual.

B. SCOPE AND RESPONSIBILITIES

This DPF Policy applies to Personal Data transferred from member countries of the European Economic Area, the United Kingdom, to BAUS operations in the U.S. in reliance on the respective DPF and does not apply to Personal Data transferred under Standard Contractual Clauses or any approved derogation from the EU General Data Protection Regulation and the UK General Data Protection Regulation.

Some types of Personal Data may be subject to other privacy-related requirements and policies. For example:

- Personal Data collected or processed through BAUS websites, web-based and mobile applications, or software are subject either to BAUS' Privacy Statement or their own privacy policies as applicable.
- Personal Data regarding and/or received from a client is also subject to any specific agreement with, or notice to, the client, as well as additional applicable laws and professional standards.
- Personal Data regarding BAUS's partners, principals, employees, directors, officers, interns, and individuals engaged with BAUS through a third party, including contractors and contingent workers (collectively, "Firm Personnel"), is subject to BAUS's internal policy.

All employees of BAUS that have access in the U.S. to Personal Data covered by this DPF Policy are responsible for conducting themselves in accordance with this DPF Policy. Adherence by BAUS to this DPF Policy may be limited to the extent required to meet legal, regulatory, governmental, or national security obligations.

In certain situations, we may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

BAUS Personnel responsible for engaging unaffiliated third parties are responsible for obtaining appropriate assurances that such third parties processing Personal Data subject to this DPF Policy have an obligation to conduct themselves in accordance with the applicable provisions of the EU-U.S. DPF Principles, including any applicable contractual assurances required by the DPF.

C. DATA PRIVACY FRAMEWORK PRINCIPLES

BAUS commits to applying the DPF's Principles to all Personal Data that BAUS in the U.S. receives from European Economic Area member countries and the United Kingdom in reliance on the respective DPF.

1. Notice

BAUS notifies Data Subjects about its data practices regarding Personal Data received by BAUS in the U.S. from member countries of the European Economic Area and United Kingdom in reliance on the respective DPF, including the types of Personal Data it collects about them, the purposes for which it collects and uses such Personal Data, the types of third parties to which it discloses such Personal Data and the purposes for which it does so, the rights of Data Subjects to access their Personal Data, the choices and means that BAUS offers for limiting its use and disclosure of such Personal Data, how BAUS' obligations under the DPF are enforced, and how Data Subjects can contact BAUS with any inquiries or complaints.



2. Choice

In accordance with the DPF, BAUS limits the use and disclosure of Personal Data of Data Subjects and Firm Personnel (residing in the EU and UK) Personal Data and provides an opt-in choice for Sensitive Personal Data collected. If Personal Data covered by this DPF Policy is to be used for a new purpose that is materially different from that for which the Personal Data was originally collected or subsequently authorized or is to be disclosed to a non-agent third party, BAUS will provide Data Subjects with an opportunity to choose whether to have their Personal Data so used or disclosed.

BAUS will obtain affirmative consent (i.e., opt-in) from Data Subjects before any Sensitive Personal Data is disclosed to a third party. If Sensitive Personal Data covered by this DPF Policy is (i) disclosed to a third party, or (ii) used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, BAUS will obtain the Data Subject's affirmative express consent (i.e., opt in) prior to such use or disclosure.

If Sensitive Personal Data covered by this DPF Policy is (i) disclosed to a third party, or (ii) used for a new purpose that is different from that for which the Personal Data was originally collected or subsequently authorized, BAUS will obtain the Data Subject's affirmative express consent (i.e., opt in) prior to such use or disclosure.

To opt out of such uses or disclosures of Personal Data or Sensitive Personal Data, Data Subjects may contact BAUS by either submitting a Data Privacy Request e-mail to dataprotection.chicago@bbsautomation.com.

3. Accountability for Onward Transfer

In the event we transfer Personal Data covered by this DPF Policy to a third party acting as a controller, we will do so consistent with any notice provided to Data Subjects, any consent they have given, and only if the third party has given us contractual assurances that it will (i) process the Personal Data for limited and specified purposes consistent with any consent provided by the Data Subjects, (ii) provide at least the same level of protection as is required by the DPF Principles and notify us if it makes a determination that it cannot do so; and (iii) cease processing of the Personal Data or take other reasonable and appropriate steps to remediate if it makes such a determination. If BAUS has knowledge that a third party acting as a controller is processing Personal Data covered by this DPF Policy in a way that is contrary to the DPF Principles, BAUS will take reasonable steps to prevent or stop such processing.

We may transfer data to the following third parties:

- Payment processing companies.
- Customer support and help desk services.
- Customer relationship management (CRM) platforms.
- Human resources and payroll providers.
- Cloud service providers.
- Legal and compliance consultants.
- Government agencies and law enforcement authorities.

With respect to our agents, including third parties acting on our behalf, we will transfer only the Personal Data covered by this DPF Policy needed for an agent to deliver to BAUS the requested product or service. Furthermore, we will (i) permit the agent to process such Personal Data only for limited and specified purposes; (ii) require the agent to provide at least the same level of privacy protection as is required by the DPF Principles; (iii) take reasonable and appropriate steps to ensure that the agent effectively processes the Personal Data transferred in a manner consistent with BAUS's obligations under the DPF Principles; and (iv) require the agent to notify BAUS if it makes a determination that it can no longer meet its obligation to provide the same level of protection as is required by the DPF Principles. Upon receiving notice from an agent that it can no longer meet its obligation to provide the same level of protection as is required by the DPF Principles, we will take reasonable and appropriate steps to stop and remediate unauthorized processing.

BAUS remains liable under the DPF Principles if an agent processes Personal Data covered by this DPF Policy in a manner inconsistent with the DPF Principles, except where BAUS is not responsible for the event giving rise to the damage.

4. Security

BAUS takes reasonable and appropriate measures to protect Personal Data covered by this DPF Policy from loss, misuse, and unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Data.



5. Data Integrity and Purpose Limitation

BAUS limits the collection of Personal Data to information that is relevant for the purposes of processing. BAUS does not process such Personal Data in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the Data Subject.

BAUS takes reasonable steps to ensure that such Personal Data is reliable for its intended use, accurate, complete, and current.

BAUS takes reasonable and appropriate measures to comply with the requirement under the DPF to retain Personal Data in identifiable form only for as long as it serves a purpose of processing. Specifically, Personal Data will be retained in accordance with our business purposes and our obligations to comply with legal requirements and professional standards, unless a longer retention period is otherwise permitted by law and its retention adheres to the DPF Principles.

If you enter into a contractual relationship with BAUS (e.g. if you place an order for our goods and services or if we award a contract to your company) or if a contractual relationship with you is planned or if we make contact with or provide information to companies or if we carry out customer satisfaction studies or product surveys, we collect the following information:

- Master data (e.g. title, first name, last name, gender)
- (Publicly available) data about your company/employer
- Communication data (e.g. business telephone number (landline and/or cell phone), valid email address, business mailing address)
- Survey data (comments and evaluations provided by the customer) and log data (time stamp showing when the customer responded to the survey)
- Data provided during the use of a training portal, e.g. participation details, evaluations, test results, and comments. The data is collected:
 - to be able to identify you or your company/your employer as our customer/potential customer for our services/supplier
 - to fulfill statutory obligations (for example, concerning supply chain transparency or combating corruption or terrorism)
 - to enter into a contractual relationship with you/your company/your employer
 - to fulfill the contract subsequently entered into with you/your company/your employer
 - to correspond with you for the purpose of entering into or fulfilling a contract
 - to issue invoices if a contractual relationship involving payment is entered into
 - to improve our customer service, services, and products
 - for marketing and advertising purposes
 - for the purposes of our legitimate interests

6. Access

Data Subjects whose Personal Data is covered by this DPF Policy have the right to access such Personal Data and to correct, amend, or delete such Personal Data if it is inaccurate or has been processed in violation of the DPF Principles (except when the burden or expense of providing access, correction, amendment, or deletion would be disproportionate to the risks to the Data Subject's privacy, or where the rights of persons other than the Data Subject would be violated). BAUS will make reasonable and practical efforts to comply with your request, so long as our doing so would be consistent with applicable law, BAUS's contractual requirements, and/or the professional standards applicable to BAUS. To make a data access request, Data Subjects may contact BAUS by either submitting a Data Privacy Request e-mail to dataprotection.chicago@bbsautomation.com.

7. Recourse, Enforcement and Liability

The Federal Trade Commission has jurisdiction over BAUS's compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF. In compliance with the DPF Principles, BAUS commits to resolve DPF Principles-related complaints about our collection or use of your Personal Data. Data Subjects with inquiries or complaints regarding our handling of Personal Data received in reliance on the DPF should first contact BAUS by either submitting a Data Privacy Request email to dataprotection.chicago@bbsautomation.com.

In compliance with the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF, BAUS commits to refer unresolved complaints concerning our handling of Personal Data received in reliance on the EU-U.S. DPF and the UK Extension to the EU-U.S. DPF to the BBB NATIONAL PROGRAMS, an independent, alternative dispute resolution provider based in the U.S. If you do not receive timely acknowledgment of your DPF Principles-related complaint from us, or if we have not addressed your DPF Principles-related



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PRODUCTION AUTOMATION



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complaint to your satisfaction, please visit www.bbbprograms.org/dpf-complaints for more information or to file a complaint. The services of BBB NATIONAL PROGRAMS are provided at no cost to you.

If your DPF complaint cannot be resolved through the above channels, under certain conditions, you may be able to invoke binding arbitration for some residual claims not resolved by other redress mechanisms. See <https://www.dataprivacyframework.gov/s/article/ANNEX-1-introduction-dpf> for further information.

BAUS agrees to periodically review and verify its compliance with the DPF Principles, and to remedy any issues arising out of failure to comply with the DPF Principles. BAUS acknowledges that its failure to provide an annual self-certification to the U.S. Department of Commerce will remove it from the Department's list of DPF participants.

D. CHANGES TO THIS DATA PRIVACY FRAMEWORK POLICY

This DPF Policy may be amended from time to time consistent with the requirements of the DPF.

When we make changes to this DPF Policy, we will revise the date in the filename shown in the footer. We encourage you to periodically review this DPF Policy to be aware of updates to our practices.

E. QUESTIONS AND COMMENTS

BAUS is committed to protecting the privacy of your Personal Data. If you have any questions or comments about this DPF Policy, please contact the U.S. Privacy Office by e-mailing dataprotection.chicago@bbsautomation.com.

