

# PRIVACY NOTICE

Where European Economic Area ("EEA") data protection laws apply to the processing of your personal information, please click <u>here</u> for further information, including relating to your specific privacy rights.

The Timken Company and its global affiliates identified at the end of this notice ("Timken," "us," "we," or "our") collect and process information about you as described in this Notice. Timken is committed to protecting the privacy of those with whom it interacts. This Privacy Notice ("Notice") contains details about how Timken collects, uses, and shares personal information that we obtain from and about you when you interact with Timken. Please read this Notice carefully.

**Applicability**: This Notice applies to personal information about individuals with whom we interact in the conduct of our business, such as individuals who visit one of the websites we operate or who are employed by or associated with one of our vendors, customers, or other business partners. This Notice does not apply to Timken employees or job applicants, or to participants under employee benefit plans offered by Timken.

When you interact with Timken on behalf of another individual or entity, such as by providing or accessing personal information about another individual, you represent that your interactions and exchanges comply with applicable data protection laws. You are solely responsible for any violation of privacy laws resulting from a failure to inform the other individual about how their personal information will be processed or to obtain any necessary consent from the individual.

**Changes**: Timken may update this Notice from time to time. The current Notice will be effective when posted. Please check this Notice periodically for updates. If any of the changes are unacceptable to you, you should cease interacting with Timken. When required under applicable law, we will notify you of any changes to this Notice.

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## 1. What Information Do We Collect?

Personal information refers to any information relating to an identified or identifiable natural person or household ("Data Subject").

#### Sources of Personal Information:

We collect information about you and how you interact with Timken in several ways depending on the nature of those interactions, including:

- Information you provide to us directly. We collect the information you provide to us directly, for example when you provide your contact information in person, in an email or letter, or on a web form.
- Information automatically collected or inferred from your interactions with Timken. We automatically collect technical information about your interactions with Timken, such as IP address and browsing preferences when you use one of our websites.
- Information from third parties. We may receive information about you and your
  interactions with Timken from third parties, such as your employer or coworkers, third party
  service and content providers, companies that provide or sell lists of potential purchasers,
  and others interacting with Timken.

We may combine information that we receive from the various sources described in this Notice, including third party sources and public sources (e.g., information you submit in a public forum), with personal information we collect independently and then use or disclose it for the purposes identified below.

## Information We Collect:

The personal information that Timken may collect about you includes:

- **Identifiers**, such as your name, alias, postal address, country of residence, unique personal identifier, online identifier, internet protocol address, email address, phone number, social media identifiers (e.g., Twitter handle, Instagram name, etc.).
- Internet or other electronic network activity information, such as your browsing history, search history, information regarding your interactions with Timken (including interacting with Timken online, by mobile application, and through advertisements), and geolocation information, such as longitude and latitude.
- **Professional, employment, or education information**, such as your job title, business address, employment history, and other professional information.
- **Inferences** drawn from any of the personal information we collect to create a profile about you reflecting your preferences.

We do not collect all of these types of personal information in all cases, or use the same scope of personal information for all types of individuals or uses.

#### 2. How Do We Use Your Personal Data?

We may use your information in several ways, including:

 To enable interactions between you and Timken, such as to facilitate our purchase or sale of goods and services and generally to conduct our business, to support you and the organization with which you are associated in your interactions with Timken, to diagnose, repair and track service and quality issues, to facilitate an order, download, return, or exchange, to provide requested product information, to communicate with you about your employer's account or regarding additional uses of your personal information beyond the scope of this list, to authenticate persons who interact with Timken, and to respond to your requests, complaints, and inquiries.

- For our own internal business purposes, such as to evaluate or audit the use, performance and safety of programs and technologies related to interactions with Timken, to evaluate and improve the quality of your interactions with Timken, to design new products and services, process and catalog your responses to surveys or questionnaires, to conduct data analysis and testing, and to maintain proper business and other relevant records.
- For legal, safety or security reasons, such as to comply with legal requirements, to protect the safety, property, and rights of Timken, those who interact with Timken, and others, and to detect, prevent, and respond to security incidents or other malicious, deceptive, fraudulent, or illegal activity.
- For marketing, such as to market our products and services or those of third parties, to
  conduct marketing surveys, questionnaires, promotions, events and contests, to enhance
  our content, and to potentially send you commercial emails (subject to compliance with
  applicable laws).
- In an anonymized or aggregated format, that is, in a way that does not identify you, for any purpose.
- For any other purpose that is compatible with the foregoing or for which you provide consent.

#### 3. With Whom Do We Share Your Information?

We may share your personal information with persons and entities other than the Timken entity that originally collected it, including the categories of recipients described below.

- Affiliates and subsidiaries: We may share your personal information within the Timken group of companies (corporate parents, corporate affiliates, subsidiaries, business units and other companies that share common ownership) for the purposes described above.
- Third party service providers: We may share your personal information with third party service providers working on behalf of Timken to facilitate an interaction with Timken that you request or to support our relationship with you and the business partner with whom you are associated. Examples of these providers include hosting service providers, IT systems and service providers, analytics companies, and marketing providers. We may contract with other companies to provide certain services, including shipping, identity verification, email distribution, market research, promotions management, and payment processing. We provide these companies with only the information they need to perform their services and work with them to ensure that your privacy is respected and protected.
- **Business Partners**: We may also share your personal information with certain business partners, such as our authorized distributors.
- For legal, security and safety purposes: We may share your personal information with law enforcement or other government agencies to comply with law or legal requirements, to enforce or apply our terms of use and other agreements, and to protect our rights and the property or safety of Timken, our business partners, and third parties.

- In connection with a transaction: If we, or some or all of our assets, merge or are acquired by another entity, including through a sale, we will share your personal information with that entity.
- Your employer or coworkers: If you interact with Timken in connection with your employment, your employer, coworkers, or other individuals designated by your employer may view any personal information that we collect in connection with your use of or interaction with Timken.

Timken does not sell your personal information. We also do not sell any information of minors under the age of 16 without their authorization.

We may also anonymize or aggregate personal information to share with third parties for any purpose.

# 4. Data Security and Retention

Timken maintains appropriate security procedures and technical and organizational measures to protect your personal information against accidental or unlawful destruction, loss, disclosure, alteration, or use.

Timken retains personal information only for as long as necessary to fulfill the stated purpose for which the personal information was collected or otherwise processed, and thereafter only for legitimate legal or business purposes, such as (i) where mandated by law, contract or similar obligations applicable to Timken's business operations, (ii) for preserving, resolving, defending or enforcing our legal/contractual rights, and (iii) when needed to maintain adequate and accurate business and financial records. We will delete personal information as soon as the respective purpose for its use is complete and no requirement to retain it for any of the purposes described above remains, except as permitted or required by applicable law.

## 5. Children's Privacy

Interactions with Timken are intended for individuals 16 years of age and older. Timken's interactions are not directed at, marketed to, or intended for children under 16 years of age. Timken does not knowingly collect any information, including personal information, from children under 16 years of age. If you believe that we have inadvertently collected personal information from a child under the age of 16, please contact us at the address below and we will use reasonable efforts to delete the child's information from our databases.

## 6. External Links

When interacting with Timken you may encounter links to external sites or other online services, including those embedded in third party advertisements or sponsor information, that are not controlled by Timken. Timken is not responsible for the privacy practices and data collection policies for those services. You should consult the privacy statements of those services for details.

## 7. Terms of Use

The <u>Terms of Use</u> for interactions with Timken is incorporated by reference into this Notice, and can be found at the link.

#### 8. Contact Info/Your Choices

If you have questions regarding this Notice, please contact Timken at:

EMAIL: DataPrivacyOffice@Timken.com

PHONE: +1-234-262-2207

866-846-5369 (toll-free in the U.S.)

MAIL: The Timken Company

Data Privacy Office/Legal

4500 Mount Pleasant Street NW North Canton, Ohio 44720 USA

To opt-out of receiving promotional email messages from us, please click on the "Unsubscribe" link contained at the bottom of each email or contact us using the information above.

## 9. EEA Data Protection Laws Section

This section applies where EEA data protection laws apply to our processing of your personal information. In the event of a conflict between information in this section and the rest of the Notice, this EEA Section will govern.

Our legal basis for collecting and using the personal information as data controllers will depend on the personal information concerned and the specific context in which we collect it. In many cases, we will process personal information about you using the following legal basis:

- Legitimate interest we process personal information to meet our legitimate business interests, such as to develop and improve our products and services, support our sales and business operations, and secure our systems, facilities and personnel.
- Legal obligation we process personal information to comply with applicable laws and regulations.
- Performance of agreement we process personal information to perform or fulfill our obligations under an agreement with your employer or other business partner with which you are affiliated.
- Consent we may process your personal information based on consent; when this is the
  case, you may withdraw your consent at any time by contacting us using the information in
  the "Contact Us" Section above.

## 10. International Transfers of Your Personal Information

By interacting with Timken or providing personal information to Timken, your personal information is transferred to the United States where Timken is headquartered (for some or all of the purposes described in this Notice above). In addition, the affiliated and non-affiliated third parties with whom we share the personal information are located in a variety of different countries. If you are not a resident of the United States, your country's laws governing data collection and use may differ from those in the United States. For example, the data protection laws of the United States have not been found by the European Commission to provide the same level of protection as EU data protection law. Transfers to countries outside the EEA take place using an acceptable data transfer mechanism, such as the EU-U.S. Privacy Shield, the EU Standard Contractual Clauses, Binding Corporate Rules, approved Codes of Conduct and Certifications, or on the basis of permissible statutory derogations. Please contact

DataPrivacyOffice@Timken.com, if you want to receive further information or, where available, a copy of the relevant data transfer mechanism.

# 11. Your EEA Privacy Rights

If you are interacting with Timken from the EEA or where EEA data protection laws apply, with certain legal exceptions and limitations, you may exercise the following rights regarding your personal information:

**Access**. You have the right to confirm with us if your personal information is being processed and certain other information about that processing, in addition to obtaining a copy of that personal information.

**Rectification**. You have the right to request the rectification of inaccurate personal information and to have incomplete personal information completed.

**Objection**. Where we are processing your personal information on the basis of our legitimate interests, you can ask us to stop processing it and we must do so unless we believe we have an overriding legitimate reason to continue processing your personal information, or we need to process it for the establishment, exercise or defense of legal claims. In addition, you have the right to object at any time if your personal information is processed for direct marketing purposes.

**Portability**. You may receive personal information that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit that data to others or to ask us to do this.

**Restriction**. You may request to restrict processing of your personal information in certain circumstances, for example if you want to establish its accuracy or the reason for processing it.

**Erasure**. You may request to erase your personal information in certain circumstances, for example, where there is no good reason for us continuing to process it, or where you have exercised your right to object to processing (see above).

**Right to lodge a complaint**. You also have the right to lodge a complaint with your data protection regulator and we will work with them to resolve it. We would, however, appreciate the chance to address your concerns before you approach the data protection regulator, and so encourage you to contact us in the first instance.

**Right to refuse or withdraw consent.** Please note that in case we ask for your consent to process your personal information, you are free to refuse to give consent and you can withdraw your consent at any time. Where you withdraw consent, we will stop using it for the specific purpose, unless we have an alternative legal basis to use it.

**Right not to be subject to automatic decision-making, including profiling.** If you have questions about exercising any of your rights or whether they apply to a particular processing activity, you may contact us at DataPrivacyOffice@Timken.com.

## 12. How We Use Cookies and Automatic Data Collection Tools

#### **Our Websites**

Our websites use cookies and automatic data collection tools. For more details, please see our Cookie Policy.

## **Online Advertising**

Timken advertises on the websites of third parties. These third parties may use cookies or tools to gather information about your browsing activities to provide advertising relevant to your interests.

You can manage your receipt of targeted advertising by visiting these sites:

in the EU, https://www.youronlinechoices.eu/

in the U.S. and other regions, http://www.aboutads.info/consumers

# **Marketing Communications**

We provide digital marketing communications about Timken with an unsubscribe mechanism in each communication. You can unsubscribe from any particular communication by clicking on "unsubscribe" in the email itself.

# **List of Applicable Timken Affiliates**

Bearing Inspection, Inc.

Timken GmbH (Germany)

Cone Drive Operations Inc.

Timken Industrial Services, LLC

Diamond Chain Company, Inc. Timken Italia S.r.l. (Italy)

EDT Corp. Timken Motor & Crane Services, LLC

Lovejoy, LLC Timken Polska SP z.o.o. (Polska)
Lovejoy Curtis, LLC Timken PWP S.r.l. (Romania)

MPB Corporation Timken Romania SA (Romania)

PT Tech, LLC Timken SMO LLC (Timken Belts)

Rail Bearing Service LLC Timken UK Limited

Timken Drives LLC The Timken Company
Timken Espana S.L. (Spain) The Timken Corporation

Timken Europe (France)

Torsion Control Products, Inc.

Timken Europe B.V.

This Notice was last updated on December 17, 2019.