



## **Data Protection and Privacy Notice**

**Last updated: November 30, 2020**

Santak Electronic (Shenzhen) Co., Ltd respects your preferences about the processing of your Personal Data. The following Privacy Notice is tailored for the different ways your Personal Data is collected by Santak.

Santak and our subsidiaries and affiliates ("Santak", "we", "us" or "our") respect your preferences concerning the treatment of Personal Data that we may collect. This Notice ("Notice") explains how we process your Personal Data, how you can control its use and how you can exercise your privacy rights. It also describes our practices regarding information collected from the different Santak sites that link or refer to this Notice (such as our websites, computer or mobile software applications, social media pages and HTML-formatted e-mail messages), as well as through offline sales and marketing activities (collectively, the "Information Channels").

The Information Channels may provide links to or the ability to connect with non-Santak websites, services, social networks or applications. Clicking on those links or enabling those connections may allow the third party to collect or share information about you. Those third-party websites or services are beyond our control. We encourage you to check the privacy policies and terms of use of any non-Santak websites or services before providing your Personal Data to them.

If you have any questions or concerns about our processing of your Personal Data, please contact us using the contact details provided at the bottom of this Notice.

Acquisitions: Santak may acquire companies that engage in online interest-based advertising. These companies will transition to this Notice as a part of integration. Please note that provisions of the existing privacy policies may remain active until the transition is complete. Please visit the privacy policies for the acquired companies for more information about these services, the types of data collected, how this data is used and opt-out options.

### **Information we collect**

Through your interaction with and use of the Information Channels, Santak may collect Personal Data, which is information that identifies an individual or relates to an identifiable



individual. Personal Data is also information collected through your interaction with and use of the Information Channels and non-Santak websites, which does not reveal your specific identity or does not directly relate to an individual, but could, when combined with other data, link back to you. Personal Data may include online or offline interactions, and includes, but is not limited to:

### **Santak Account Data**

When you create an Santak Account, we collect the following Personal Data:

- Name
- Salutation
- Email address
- Password
- Country and language preference
- Customer number
- Company name
- Company address
- City
- State
- Zip code
- Fax number
- Mobile phone number
- Company phone number
- Organization type
- Job title/specialty
- Customer account number
- Organization type
- IP address

We use this Personal Data in order to create and maintain your Santak Account. You can use your Santak Account for various services. When using your Santak Account for a service, we may add additional Personal Data to your Santak Account.

Your Santak Account creation only happens at your request and we consider the processing of your Account Data to be necessary for the performance of the contract.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Purchase and Registration Data**

You can purchase Santak products and services and register your product. When you



purchase products/services, and when you register your product, we collect the following Personal Data:

- Shipment and invoice address
- Phone number
- Invoice history, which includes an overview of Santak products/services purchased
- Details of conversations that you may have with the Customer Care departments around your purchase questions or online shop experience questions
- Details of your registered product/service, such as the name of the product/service, the product category it belongs to, the product model number, date of purchase, proof of purchase
- First name
- Last name
- Account number
- Email address
- IP address

We use this Personal Data to fulfil your purchase and/or register your product. When you have an Santak Account, you may also register your product. If you sign in with your Santak Account, your Purchase and Registration Data will be added to your Santak Account. If you purchase Santak products/services as a 'guest' we will use your Purchase & Registration Data to fulfil your purchase, but will not add the information to your Santak Account.

Purchase and registration of products only happens at your request and we consider the processing of your Purchase and Registration Data to be necessary for the performance of the contract to which you.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Product Tester Data**

When you have an Santak Account or you interact with Santak's marketing campaigns, you can sign up to become an Santak product/service tester and tell us what you think about our products or services.

When you sign up to become an Santak product/service tester we will collect the following Personal Data:

- Type of products that you are interested in, so that we can inform you about relevant product tests



- Information around your product tester application, such as: to which product you have applied to become a tester and answers to the selection survey in case such a survey was part of the selection procedure
- Overview of which tests you have participated
- Shipment/fulfillment data such as: your shipment/invoice information and telephone number
- Your feedback and review around the tested Santak products and services
- Activity participation
- First name
- Last name
- Email address

We use this Personal Data to invite you to participate as a tester and we use your feedback to improve and develop products and services in relation to the tested product and services. Your Product Tester data will be added to your Santak Account.

We consider the processing of your Product Tester Data to be based on legitimate interest of Santak to improve our range of products and services.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Promotional Communications Data**

You can choose to sign up for marketing and promotional communications. When you sign up for marketing and promotional communications, we will use the following Personal Data:

- Email address (if you don't have an account)
- First name
- Last name
- Salutation
- Your Santak Account Data
- Date of birth
- Company
- Address
- City
- State
- Zip code
- Country
- Job function
- Buying role



- Business phone number

We may collect this through our interactions with Santak Pages, Santak mobile apps, the emails you clicked and opened and attendance of events. We use this Personal Data to send you promotional communications – based on your preferences and behavior – about Santak products, services, events and promotions.

Based on your consent or if Santak has a legitimate interest, our group companies may contact you with promotional communications via email, SMS and other digital channels, such as mobile apps and social media. To be able to tailor the communications to your preferences and behavior and provide you with the best, personalized experience, we may analyze and combine all information associated with your Account Data and data about your interactions with Santak. We also use this information to create segments of our audience showing which of our products and/or services users are interested in and track success of our marketing efforts. We may also send Santak press releases by email (Press email data). When Santak sends press releases, Santak will process your name, contact details (e.g. email) and company information.

As described above the processing of Personal Data for Promotional Communications is based on your consent or if Santak has a legitimate interest. Where Santak processes your Personal Data based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before withdrawal of consent. Santak will give you the opportunity to withdraw your consent to receiving promotional communications at any time via the unsubscribe link at the bottom of each promotional communications email you may receive from us.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Competition Data**

You may choose to participate in sweepstakes, contest games or other competitions (Competition) via our Santak Pages.

When you sign up for a Competition, we may use the following Personal Data:

- Your social media profile data in case you participate via your social media account
- First name
- Last name
- Email address
- Telephone number



- Physical/postal address
- Clothing size
- Photo
- Material or content generated and provided by you that allows you to participate in the sweepstake, contest, game or other Competition

We use this Personal Data to allow you to participate, to identify you, to prevent/detect fraud and to fulfill the prize to you (if you win) and we consider the processing of your Competition Data in the above context to be necessary for the performance of the contract.

Please read the terms and conditions of the respective sweepstake, contest, game or other Competition for further information.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

#### **Online Feedback Data**

You can choose to give your feedback, comments, questions, ratings and reviews in online evaluations (Online Feedback). Where you make use of this opportunity, we will process the following Personal Data:

- Your cookie ID
- Your feedback/comments/questions/your rating review
- Your contact details if you provide them to us (name, email address, telephone number)

We use this Personal Data to provide Santak with valuable insights to improve our Santak Pages or products/services and consider the processing of your Online Feedback Data to be based on legitimate interest of Santak to improve our Santak Pages and our range of products and services.

For more information on your registration and privacy choices, including the ability to unsubscribe, [click here](#).

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

#### **Events Data**

Santak may collect data for events, webinars or fairs (“Events”) that you may wish to attend and register for via the Santak Pages. You may either register for the Event via Santak Pages



or via other organizing companies. When you register for an event, we will process the following information:

- First name
- Last name
- Email
- Country
- Salutation
- Product/service of interest
- Company
- Address
- Business phone number

Furthermore, we might need the following information when you interact with Santak as a Professional:

- Account Data
- Specialty
- Facility
- Products of interest
- Date

In rare cases where Santak is directly booking travel or accommodations for you, we may collect the following information:

- Time slot
- Business phone
- Relevant dietary information
- Data concerning health (such as ADA accommodations)
- Time/date of arrival and departure
- Hotel information
- Frequent flyer number or other loyalty programs
- Driver's license number
- Flight details
- Clothing size (e.g. for promotional items)
- Gender

By registering for an event, you are agreeing to receive communications from Santak directly related to the event, such as what location the event will be hosted at and what time the event takes place. We are processing this data as it is necessary for the performance of the contract to which you are party.



For more information on your registration and privacy choices, including the ability to unsubscribe, [click here](#).

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Social Listening Data**

When you interact or communicate on social media channels/pages/promotions and blogs (e.g. when you click on 'like' or 'share', when you post and share comments and when you submit ratings and reviews) your Personal Data is processed by a third party that provides social listening services to Santak. This means that the third party that provides social listening services will retain a copy of your online publicly available interactions to which the third party has provided us access.

The Personal Data we collect includes publicly available data provided in the social media context by you from the relevant social media provider via a third party that provides social listening services such as:

- First name
- Gender
- Birthday or age
- Homepage
- Profile photo
- Time zone
- Mailing address
- Email address
- Country
- Interests
- Comments and/or content you have posted/shared

We use this Personal Data to gain a general view of the opinion of people about us and our brands, to get an idea of relevant online influencers, to resolve issues and/or improve Santak products and services and/or start a promotional conversation with you. We consider the processing of Social Listening Data in the above context to be based on a legitimate interest of Santak.

If you don't want to share this information with us as described above, do not interact with Santak on social media channels.

For more information about your data protection rights, [click here](#).



For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Consumer or Customer Care Data**

You may from time to time interact with our Consumer or Customer Care centers. When you contact Customer Support, or when you communicate with one of our Santak Customer Care representatives by email, phone or in writing (e.g. reply card) we will use the following Personal Data:

- Your Account data
- Purchase history, the content of your questions, or requests that you addressed
- Occasionally where applicable and necessary, your call recording and history. If this is the case, you will hear a message at the beginning of the call informing you about the potential of being recorded

We use this Personal Data to provide you with consumer and customer support (which may be product- or service related), respond to your inquiries, fulfil your requests and provide you with related customer service, such as repair or redeem products/services. We also use this Personal Data to improve, fix and customize our products and services, to meet compliance standards and to educate our Customer Care employees during training.

If we provide this service on the basis of an agreement with you, we consider the processing of your Personal Data to be necessary for the performance of the contract to which you are party. In other cases, we consider the processing of your Personal Data in the above context to be based on a legitimate interest of Santak.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).

### **Visitor Experience Data**

Where we use Personal Data we have collected from you while you have been using Santak Products/Services and/or our Santak Pages for analytical purposes, we do this in order to improve our Products/Services and to enhance your user experience. We also do this in order to have a general overview of the category of audiences that are interested in which of our Products and/or Services. This processing is based on legitimate interest of Santak to improve our Santak Pages and our range of products and services.

For more information on the cookies we use, [click here](#).

For more information on retention and deletion of data, [click here](#).



### **Sensitive Personal Data**

Santak will not seek to collect any Sensitive Personal Data from you. Sensitive Personal Data includes, amongst others, racial or ethnic origin, physical or mental health and religious beliefs. Therefore, we only collect Sensitive Personal Data when you have deliberately made it public and have exposed that data to us. Once Santak is processing that data, you will have the same rights as described below.

For more information about your data protection rights, [click here](#).

### **Children**

The Information Channels are not directed to children under 13. We do not knowingly collect personal identifiable information or Personal Data from anyone under 13 years of age. If we determine upon collection that a user is under this age, we will not use or maintain his/her personal identifiable information or Personal Data without a parent/guardian's consent. If we become aware that we have unknowingly collected personal identifiable information or Personal Data from a child under the age of 13, we will delete such personal identifiable information or Personal Data from our records.

If a parent or guardian becomes aware that his or her child has provided us with his or her Personal Data without their consent, please contact us via [dataprotection@eaton.com](mailto:dataprotection@eaton.com).

### **How we collect information**

In addition to the ways described in the 'Information we collect' section, Santak may collect personal data from a variety of sources that generally fall into these categories:

- Publicly available data / Data from third parties: Data from automated interactions on non-Santak websites, or other data you may have made publicly available, such as social media posts, or data provided by third party sources, such as marketing opt-in lists or data aggregators.
- Automated interactions: From the use of technologies such as electronic communication protocols, cookies, embedded URLs or pixels, or widgets, buttons and tools.
- Electronic communications protocols: Santak may automatically receive information from you as part of the communication connection itself, which consists of network routing information (where you came from), equipment information (browser type or device type), your IP address (which may identify your general geographic location or company) and date and time.
- Santak may also automatically receive and record information about your interaction



with the Information Channels, such as clickstream information (when each Santak webpage was visited and how much time was spent on the page), how often you access the Information Channel, performance data, aggregate usage or general geo-location data.

- Like many companies, Santak uses “cookies” and other similar tracking technology (collectively “Cookies”). Santak’s server will query your browser to see if there are Cookies previously set by our electronic Information Channels.

For more information on the cookies we use, [click here](#).

### **Affiliates, service providers and third-party sharing**

We may disclose your Personal Data:

- To our affiliates or subsidiaries for the purposes described in this Privacy Notice
- To our third-party service providers who provide services such as website hosting, data analysis, payment/billing processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, CRM, identity management, event management, marketing intelligence, auditing, fraud detection and other services
- To third parties, to permit them to send you marketing communications, consistent with your choices if you have opted into such sharing
- To third-party sponsors of sweepstakes, contests and similar promotions
- To your connections associated with your social media account, to other website users and to your social media account provider, in connection with your social sharing activity. By connecting your Santak Account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share is governed by the social media provider’s privacy policy
- When you interact with Santak as a business customer, supplier or business partner, Santak may disclose Personal Data available in reports and other materials provided by you and/or your company pursuant to an engagement with another business partner and/or a supplier.
- Under specific circumstances, Santak may provide your data to third party channel partners to facilitate a sale, provide technical support or answer questions you have asked of Santak.

For more information about your data protection rights, [click here](#).

For more information on retention and deletion of data, [click here](#).

For more information on how this data might be shared with third parties, [click here](#).



### **Other uses and disclosures**

We may also use and disclose your Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, which may include laws outside your country of residence, to respond to requests from public and government authorities, which may include authorities outside your country of residence, to cooperate with law enforcement or for other legal reasons; (b) to enforce our terms and conditions; and (c) to protect our rights, privacy, safety or property, and/or that of our affiliates or subsidiaries, you or others.

In addition, we may use, disclose or transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

### **Cookies**

Like many companies, Santak uses "cookies" and other similar tracking technology (collectively "Cookies"). Santak's server will query your browser to see if there are Cookies previously set by our electronic Information Channels.

#### **What are cookies?**

A cookie is a small text file which is placed on your device. Cookies help to analyze web traffic and allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Certain cookies may contain Personal Data – for example, if you click "Remember me" when logging in, a cookie may store your username. Cookies may collect information, including a unique identifier, user preferences, profile information, membership information and general usage and volume statistical information. Cookies may also be used to collect individualized website use data, provide electronic Information Channel personalization or conduct and measure the effectiveness of advertising in accordance with this Notice.

Cookies set by the website owner (in this case, Santak) are called "first-party cookies". Cookies set by parties other than the website owner are called "third-party cookies." Third-party cookies enable third-party features or functionality to be provided on or through the website (e.g. like advertising, interactive content and analytics). The parties that set these third-party cookies can recognize your computer both when it visits the website in question and also when it visits certain other websites.

#### **What do we use cookies for?**

We use first-party and third-party cookies for several reasons. Some cookies are required for



technical reasons in order for our Information Channels to operate, and we refer to these as "essential" or "strictly necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Information Channels. Third parties serve cookies through our Information Channels for advertising, analytics and other purposes.

We may place cookies or similar files on your device for security purposes, to tell us whether you have visited the Information Channels before, to remember your language preferences, to determine if you are new visitor or to otherwise facilitate site navigation, and to personalize your experience on our Information Channels. Cookies allow us to collect technical and navigational information, such as browser type, time spent on our Information Channels and pages visited. Cookies also allow us to select which of our advertisements or offers are most likely to appeal to you and display them to you. Cookies may enhance your online experience by saving your preferences while you are visiting a website.

The specific types of first- and third-party cookies served through our Information Channels and the purposes they perform are described via the link below (please note that the specific cookies served may vary depending on the specific Information Channel you visit).

#### **What about other tracking technologies, like web beacons?**

Cookies are not the only way to recognize or track visitors to a website. We may use other similar technologies from time to time, like web beacons (sometimes called "tracking pixels" or "clear gifs"). These are tiny graphic files that contain a unique identifier that enable us to recognize when someone has visited our websites or opened an email we have sent them. This allows us, for example, to monitor the traffic patterns of users from one page within our websites to another, to deliver or communicate with cookies, to understand whether you have come to our websites from an online advertisement displayed on a third-party website, to improve site performance, and to measure the success of email marketing campaigns. In many instances, these technologies are reliant on cookies to function properly, and so declining cookies will impair their function.

#### **How can you manage your cookies?**

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) to disable existing cookies; or (iii) to set your browser to automatically reject any cookies. However, please be aware that if you disable or reject cookies, some features and services may not work properly because we may not be able to recognize and associate you with your Santak Account(s). In addition, the offers we provide when you visit us may not be as relevant to you or tailored to your interests.



For more information on which cookies we use, [click here](#).

## **Advertising technologies and networks**

Santak uses third parties such as Google, Facebook, LinkedIn and Twitter and other programmatic advertising platforms to administer Santak advertisements on third-party electronic channels. Personal data, such as user community or implied or inferred interests, may be used in the selection of advertising to make sure that it has relevance to the user. Some ads may contain embedded pixels that may write and read cookies or return session connection information that allows advertisers to better determine how many individual users have interacted with the ad.

Santak may also use advertising technologies and participate in advertising technology networks that collect usage information from Santak and non-Santak websites, as well as from other sources, to show you Santak-related advertisements on Santak's own and third-party websites. These advertisements may be tailored to your perceived interests using retargeting and behavioral advertising technologies. Any retargeted or behavioral advertisements served to your browser will contain information on or near it that informs you about the advertising technology partner and how to opt-out of viewing such advertisements. Opting-out does not mean that you will stop receiving ads from Santak. It means that you still stop receiving ads from Santak that have been targeted to you based on your visits and browsing activity across websites over time.

Cookie-based tools that allow you to opt-out of Interest-Based Advertising prevent Santak and other participating advertising technology companies from serving interest-related ads to you on behalf of Santak. They will only work on the internet browser on which they are deposited, and they will function only if your browser is set to accept third-party cookies. These cookie-based opt-out tools may not be as reliable where (e.g., certain mobile devices and operating systems) cookies are sometimes automatically disabled or removed. If you delete cookies, change browsers, computers or use another operating system, you will need to opt-out again.

## **Legal basis for processing Personal Data**

Our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it.

We will normally collect Personal Data from you only (i) where we have your consent to do so (ii) where we need the Personal Data to perform a contract with you, or (iii) where the



processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

If we ask you to provide Personal Data 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 Data is mandatory or not (as well as of the possible consequences if you do not provide your Personal Data).

### **Limitation of liability for external links**

This Privacy Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Santak Pages link. The inclusion of a link on the Santak Pages does not imply endorsement of the linked site or service by us or by our affiliates or subsidiaries.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or in connection with the Santak Pages. These other organizations may have their own privacy notices, statements or policies. We strongly suggest that you review them to understand how your Personal Data may be processed by those other organizations.

By connecting your Santak Account and your social media account, you authorize us to share information with your social media account provider, and you understand that the use of the information we share will be governed by the social media provider's privacy policy. Your Personal Data may be shared with your friends associated with your social media account, to other website users and to your social media account provider, in connection with your social sharing activity. Santak is bound by the privacy practices or policies of these third parties.

For more information on how this data might be shared with third parties, [click here](#).

For information on international data transfers, [click here](#).

### **How do we secure your Personal Data?**



We use appropriate technical and organizational measures to protect the Personal Data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the [“How to contact us”](#) section below.

### **How long will personal data be kept?**

Santak will retain your Personal Data for as long as needed to provide you products or services; as needed for the purposes outlined in this Notice or at the time of collection; as necessary to comply with our legal obligations (e.g., to honor opt-outs), resolve disputes and enforce our agreements; or to the extent permitted by law.

At the end of the retention period or when we have no ongoing legitimate business need to process your Personal Data, Santak will delete or anonymize your Personal Data in a manner designed to ensure that it cannot be reconstructed or read. If this is not possible, then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

### **International data transfers**

Your Personal Data may be transferred to and processed in countries other than the country in which you are resident. These countries may have data protection and privacy laws that are different to the laws of your country.

We have taken appropriate safeguards to require that your Personal Data will remain protected in accordance with this Notice. These include implementing the European Commission’s Standard Contractual Clauses for transfers of Personal Data between our group companies, which require all group companies to protect Personal Data they process from the European Economic Area (EEA) in accordance with European Union data protection law. Santak adheres to the principles of EU-US and Swiss-US Privacy Shield frameworks, although Santak does not rely on the EU-US and Swiss-US Privacy Shield framework as legal basis for the transfer of Personal Data in light of the judgement of the Court of Justice of the European Union in Case C-311/18. Instead, Santak uses different legal mechanisms to transfer Personal Data from Europe, the United Kingdom and Switzerland to the US as described above.

### **Privacy Shield Information for Personal Data transferred prior to July 16, 2020**



Santak' s US affiliates certified to the EU-U.S. and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the transfer of Personal Data from the European Economic Area (EEA), the United Kingdom, and Switzerland to the United States. Although the EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield have been ruled invalid for the transfer of data, where Personal Data has already been transferred to the U.S. on the basis of the EU-U.S. Privacy Shield or Swiss-U.S. Privacy Shield, we will continue to protect Personal Data from the EU, Switzerland and the United Kingdom according to the standards of the Privacy Shield and applicable EU law.

In compliance with the Privacy Shield Principles, Santak' s US affiliates commit to resolve complaints about our collection or use of your Personal Data. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact Santak. You can find the contact information at the end of this section.

Santak' s US affiliates have further committed to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) with regard to unresolved Privacy Shield complaints concerning human resources data transferred from the EU and Switzerland in the context of the employment relationship.

Under certain circumstances, you may invoke binding arbitration for complaints regarding Privacy Shield compliance when other dispute resolution procedures have been exhausted. Santak' s US affiliates are subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC). In that regard, it certifies that it complies with the seven EU-US Privacy Shield Framework Principles set forth by the United States Department of Commerce, in relation to Personal Data collected in the European Union.

Santak' s US affiliates are responsible for the processing of Personal Data it received under the Privacy Shield Framework and subsequently transferred to a third party acting as an agent on its behalf. Santak' s US affiliates comply with the Privacy Shield Principles for all onward transfers of Personal Data from the EU and Switzerland, including the onward transfer liability provisions.

To learn more about the Privacy Shield program, the Privacy Shield Principles and to view our certification page, please visit the U.S. Department of Commerce's Privacy Shield List by clicking on the following link: <https://www.privacyshield.gov/>.

Santak US affiliates:

- Eaton Corporation
- Azonix Corporation
- Bussmann International Holdings, LLC
- Bussmann International, Inc.



- Cannon Technologies, Inc.
- CBE Services, Inc.
- Chagrin Highlands III Ltd.
- Cooper B-Line, Inc.
- Cooper Bussmann, LLC
- Cooper Crouse-Hinds MTL, Inc.
- Cooper Crouse-Hinds, LLC
- Cooper Electrical International, LLC
- Cooper Enterprises LLC
- Cooper Finance USA, Inc.
- Cooper Industries International, LLC
- Cooper Industries, LLC
- Cooper Interconnect, Inc.
- Cooper Notification, Inc.
- Cooper Power Systems, LLC
- Cooper Technologies Company
- Cooper Wheelock, Inc.
- Cooper Wiring Devices, Inc.
- Eaton Aeroquip LLC
- Eaton Aerospace LLC
- Eaton Ann Arbor LLC
- Eaton Electric Holdings LLC
- Eaton Holding LLC
- Eaton Hydraulics LLC
  
- Eaton Industrial Corporation
- Eaton Leasing Corporation
- CLS Holding LLC
- Eaton US Holdings, Inc.
- Cooper Industries Poland, LLC
- EIC Holding GP III
- EIC Holding GP IV
- Eaton Automated Transmission Technologies Corporation
- EIC Holding IV LLC
- EIC Holding V LLC
- EIC Holding VI LLC
- McGraw-Edison Development Corporation
- MTL Instruments LLC
- MTL Partners II, Inc.
- MTL Partners, Inc.
- Standard Automation & Control LP



- Sure Power, Inc.
- Wright Line Holding, Inc.
- Wright Line LLC
- Eaton Industries IX LLC
- Cooper Industries Vietnam, LLC
- Eaton Industries VIII LLC
- Eaton Industries XVI LLC
- Eaton Industries (Philippines), LLC
- Cooper Industries Middle East, LLC
- Cooper Industries South Africa, LLC

Individuals with inquiries or complaints regarding this Privacy Notice, or any Data Protection and Privacy related concerns should contact Santak at:

Eaton  
Global Ethics and Compliance Data Protection and Privacy Office  
1000 Eaton Boulevard  
Cleveland, Ohio 44122

or

via email to: [dataprotection@eaton.com](mailto:dataprotection@eaton.com)

## **Your data protection and privacy rights**

To the extent provided by the law of your country or state you have the following data protection and privacy rights:

- If you wish to access (right to know), correct, update or request deletion of your Personal Data, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading below. Alternatively, you have the ability to update your Santak profile and related Personal Data at any time. To change this information, please visit the Preference Center.
- In addition, you can object to processing of your Personal Data, ask us to restrict processing of your Personal Data or request portability of your Personal Data. You can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading below.
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing emails we send you. To opt-out of other forms of marketing (such as postal



marketing or telemarketing), please contact us using the contact details provided under the “How to contact us” heading below. Please note that if you opt-out of receiving marketing communications from us, we may still send you important administrative messages, from which you cannot opt-out. For more information on your registration and privacy choices, including the ability to unsubscribe, [click here](#).

- Similarly, if we have collected and process your Personal Data with your consent, 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 Data conducted in reliance on lawful processing grounds other than consent.
- For California Residents only: Right to Opt-Out. You have the right to opt-out of the sale of your personal information. Santak only in rare cases will sell your personal information to any third-party. For such cases you always have the right to opt-out of that sale. In order to do so please either [click here](#) or use the ‘CCPA – Do Not Sell Request’ in the footer of our website.

You can execute your right at any time by contacting us by sending an email to [dataprotection@eaton.com](mailto:dataprotection@eaton.com) or for California Residents only by calling +1-800-386-1911 or by using this [online form](#). We will try to comply with your request(s) as soon as reasonably practicable within the required timeframe specified in the data protection and privacy law of the country and state you are residing in.

In your request, please specify what right you want to execute and what Personal Data this is referring to. For your protection we may need to verify your identity before implementing your request.

If you make use of (some of) your choices and rights, you may not be able to use, in whole or in part, certain Santak services.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion (e.g. when you make a purchase or enter a promotion, you may not be able to change or delete the Personal Data provided until after the completing of such a purchase or promotion).

For more information on retention and deletion of data, [click here](#).

You also have the **right to complain to a data protection authority** competent for your country or region about our collection and use of your Personal Data.

## Registration and privacy choices



A list of your current Privacy Choices is available [here](#).

Santak allows you to establish a preference profile for marketing communications. You may use the profile to customize and control your preferences for receiving electronic information, including opting into (or out of) communities, newsletters and general interest areas. You can return to your preference profile at any time to change your selections or modify your profile.

Email marketing: Santak enables you to opt-out of marketing communications. You may opt-out of email marketing by modifying your preference profile as described above or by using our general unsubscribe automated link that is included in all Santak marketing emails. If you have any problems using any of these opt-out mechanisms, please contact us using the information under the "[How to contact us](#)" header at the bottom of this Notice.

Some non-marketing communications are not subject to general opt-out, such as customer communications related to product download, sales transactions, software updates and other support related information, patches and fixes and disclosures to comply with legal requirements (where permitted by law). Some additional communications with distributors and resellers are also not subject to general-opt-out, including product alerts, updates, contractual marketing and sales materials and other notices related to partner status.

All Santak email communications are tracked for quality delivery assurance and might be tracked for marketing and analytics purposes.

Mobile applications: Santak 's mobile applications may send push notifications directly to your mobile device for the purposes specified in this Notice. You may opt-out of receiving such push notifications and location-based services on your mobile device at any time by editing the notification and location settings on your mobile device.

## **Updates to our Data Protection and Privacy Notice**

This Notice and other policies may be updated periodically and without prior notice to you, and any changes will be effective immediately upon the posting of the revised Notice on the Information Channels. However, we will use your Personal Data in a manner consistent with the Notice in effect at the time you submitted the Personal Data, unless you consent to the new or revised Notice. We will post a prominent notice on the Information Channels to notify you of any significant changes and indicate at the top of the Notice when it was most recently updated.

We will obtain your consent to any material Notice changes if and where this is required by



applicable data protection laws.

## How to contact us

If you have any questions or comments about this Notice, concerns about our processing of your Personal Data or any other question related to data protection and privacy please contact us by emailing [dataprotection@eaton.com](mailto:dataprotection@eaton.com) or writing to the address below:

Eaton  
Attention: Global Data Protection and Privacy Office  
1000 Eaton Boulevard  
Cleveland, Ohio 44122

## Notice to California Residents

This section applies to California Residents.

The personal information we collect might, depending on the situation, include identifiers, characteristics of protected classifications under California Federal Law, commercial information, internet or other network activity information, geolocation information, audio, electronic, visual or similar information, professional or employment-related information and inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes. For detailed information on what we collect please review the '[Information we collect](#)' section of this Notice.

As described in this Notice personal information we collect from consumers might be shared for business or commercial purposes with third parties. You can find more details on this third-party sharing in the '[Affiliates, service providers and third-party sharing](#)' section.

We might have disclosed all of the categories of personal information listed above, based on the use case, for a business purpose in the past 12 months.

As a California resident you have certain rights, subject to legal limitations and applicable exceptions, regarding the collection, use, and sharing of your personal information. Those right are in particular:

- The right to know
- The right to delete



- The right to opt-out

For more information about your data protection rights, [click here](#).

In accordance with applicable law, we will not discriminate against you for exercising these rights. You may use an authorized agent to exercise your rights on your behalf. If you are making any of the requests above through an authorized agent, we will request written authorization from you and will seek to verify your identity or we will accept a legal Power of Attorney under the California Probate Code to the authorized agent. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You can execute your right, including the Do-Not-Sell request at any time by contacting us by sending an email to [dataprotection@eaton.com](mailto:dataprotection@eaton.com), by calling +1-800-386-1911 or by using this [online form](#).

We will respond to a Request to Opt-Out within 15 days. We will respond to Requests to Delete and Requests to Know within 45 days, unless we need more time, in which case, we will notify you and may take up to 90 days total to respond to your request.

### **Do Not Track**

Some third-party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. Santak does not do this on Santak websites. If you are visiting such sites, some browsers allow you to set the DNT signal on your browser so that third parties (particularly advertisers) know you do not want to be tracked. Visit your browser settings to learn how to set these Do Not Track Signals.

Third parties that have content embedded on Santak 's websites, such as a social feature or a stock ticker, may set cookies on a user's browser and/or obtain information about the fact that a web browser visited a specific Santak website from a certain IP address. Third parties cannot collect any other personally identifiable information from Santak 's websites unless you provide it to them directly.