# **Privacy Policy**

Release date: [March 1st 2023]

[Special Reminder] The usage of the website (hereinafter referred to as "Website") is on the condition that you accept all the terms of this Policy. Please read carefully before using the Website (Children under the age of 14 should read with parent(s) or legal guardian(s)) and understand this policy (especially the terms marked in bold/bold underline) to make an appropriate choice. When you agree to this Policy, it means that you have agreed to our processing of your personal information in accordance with this Policy.

We are pleased about your visit and your interest in our website. The protection of your personal information is a matter of course for us. We would therefore like to inform you in the following about how your personal information is processed at GEHRING. The website  $\underline{+}$  <u>B</u> | <u>Gehring</u> (<u>gehring-group.com</u>) is an offer from Gehring Technologies GmbH Ostfildern (hereinafter referred to as Gehring HQ) and jointly controlled by Gehring Machine Tool (Shanghai) Co., Ltd. (hereinafter referred to as GSH).

Gehring HQ and GSH only collect, store and process your personal information if this is permitted by law or if you have given your consent. If you would like to obtain information on the data stored by Gehring HQ or GSH, please contact us at the address given hereunder.

Personal information (hereinafter referred to as Personal Information, also referred to as personal data) refers to all kinds of information related to identified or identifiable natural persons recorded by electronic or other means, excluding the information handled anonymously. Personal Information includes in particular the name, address, age, e-mail address and telephone number of a person.

In this Policy, "we", "our", "us" or "Gehring Group" jointly refers to Gehring HQ and GSH.

- 1. Introduction
- 1.1. The outline of this Privacy Policy is as follows:
  - 1) Introduction
  - 2) What kind of Personal Information do we collect and how to use it
  - 3) How do we use cookies and other technologies
  - 4) How do we entrust others to process, provide, transfer, publicly disclose and store your Personal Information
  - 5) How do we protect your Personal Information
  - 6) Your rights
  - 7) How do we deal with Sensitive Personal Information

- 8) How does your Personal Information shift around the world
- 9) How to update this policy
- 10) Dispute resolution
- 1.2. We know the importance of Personal Information to you and will do our best to protect your Personal Information safely and reliably. We are committed to maintaining your trust in us and following the principles of legality, justification and necessity, openness and transparency to protect your Personal Information. At the same time, we take appropriate security measures to protect your Personal Information according to current security standards.
- 2. What kind of Personal Information do we collect and how to use it
- 2.1. We will collect your Personal Information through following channels and for following purposes:
- 2.1.1. Newsletter

To offer you the latest news about the worldwide development of the Gehring Group individually, you can subscribe our newsletter on our Website. For the subscription, you need to provide us with basic registration information, including your name, salutation and email address. Please note that you can voluntarily fill in your company name. If you are not willing to subscribe as an individual newsletter reader, you can also browse the corresponding news on the Website.

#### 2.1.2. Contact form

Gehring Group offers you extensive personal support. If you contact us via the contact form, you need to provide us with your company name, position, name, email address, inquiry concerns, and additional message for inquiry. Besides, you can voluntarily fill in other information such as street, postcode, province and country. The data will only be used to answer your enquiry and will not be used for a sales conversation or otherwise for advertising purposes.

#### 2.1.3. Job application

You can apply for the job in our team and submit your job application on the Website. For job application, you need provide us with your name, email address and your curriculum vitae and additional message.

#### 2.2. Exceptions for acquiring your consent

We will generally try to ask you for your consent before processing your Personal Information. Please be aware that in certain cases we are not required to ask you for your consent. These cases inter alia include:

- It is necessary for the conclusion or performance of a contract to which you are one of the parties;
- It is necessary for the performance of statutory duties or statutory obligations;
- It is necessary for the response to a public health emergency or for the protection of the life, health and property safety of a natural person;
- Such acts as news reporting and supervision by public opinions are carried out for the public interest, and the processing of personal information is within a reasonable scope;
- It is necessary to process the personal information disclosed by you or other personal information that has been legally disclosed within a reasonable scope in accordance with the provisions of this law; and
- Other circumstances prescribed by laws and administrative regulations.
- 2.3. We generally process your Personal Information until you request removal or deletion of your Personal Information, except we are required to store the Personal Information by applicable laws and regulations. Furthermore, we will delete Personal Information once it is not necessary anymore to reach the above-mentioned purposes.
- 2.4. When we want to use your Personal Information for other purposes that we did not clearly state in our policy, we will ask for your consent beforehand.
- 3. How do we use cookies and other technologies
- 3.1. Protocol data

The automatically accrued data includes the protocol data of the web server. Each time you access a page from our offer and each time a file is called up, access data about this process is stored in a log file on Gehring server.

Each record consists of:

- IP address of requesting client (individual "address" of a PC in a computer network)
- Date and time of access
- URL of the retrieved file
- Webpage URL from which access is made (referrer)
- The identification of the browser used by the client
- The stored data is evaluated anonymously for statistical purpose only

## 3.2. Cookies

Cookies are small files containing a character string in which certain information has been stored in an open or encrypted form. Cookies are sent from the server to your computer and stored there. They first serve to identify the computer from which a website was called up. If you log on to a website, cookies are used to inform the server that you are logged on and to check your authorization to call up a page. Every cookie has an expiry date, after which it is no longer valid. However, this expiration date can be a long time in the future.

Cookies can be used to track a user's path across different pages of the website and also across different websites. Cookies can be used to improve communication between the website server and your computer, thereby making the use of a website more convenient. Cookies may not only come from the website operator, but also from third parties, for example if there is advertising on the site.

You can use your browser to view the cookies that are stored on your computer, to delete existing cookies, or to set your configuration so that not all or no cookies are stored. Please note that some functions (such as login) may not work or may not work properly if you disable the setting of cookies.

| Provider | Name of the cookie  | Function of the cookie   |
|----------|---------------------|--------------------------|
| Google   | _ga                 | Is used to differentiate |
|          |                     | between users            |
| Google   | _gid                | Is used to differentiate |
|          |                     | between users            |
| Google   | _gat                | Is used to throttle the  |
|          |                     | request rate             |
| Drupal   | has_js              | Saves the information of |
|          |                     | whether JavaScript is    |
|          |                     | activated in the browser |
| Drupal   | hide_cookie_warning | Saves the information of |
|          |                     | whether the user has     |
|          |                     | already clicked away the |
|          |                     | cookie warning           |

The cookies on the Website for the following purposes to ensure proper operation:

# 3.3. Google Analytics

In order to improve web offer, Google Analytics is used by the Website, a web analysis service of Google Inc. ("Google"). Google Analytics uses cookies which are stored on your computer and which enable an analysis of your use of the Website. The information generated by the cookie about your use of this Website such as

- Browser type/version
- Operating system used
- Referrer URL (the previously visited page)
- Host name of the accessing computer (as IP address in shortened form)
- Time of the server request
- The approximate location of the accessing computer

are usually transferred to a Google server in the USA and stored there. However, due to the activation of IP anonymization on this Website, your IP address will be shortened by Google within member states of the European Union or in other signatory states to the Agreement on the European Economic Area before this happens. Only in exceptional cases will the full IP address be transferred to a Google server in the USA and shortened there. On behalf of the operator of this Website, Google will use this information to evaluate your use of the Website, to compile reports on the Website activities and to provide further services to the Website operator in connection with the use of the Website and the Internet. The IP address transmitted by your browser within the scope of Google Analytics is not combined with other data from Google. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not be able to use the full functionality of this Website. You can also prevent the collection of data generated by the cookie and related to your use of the Website (including your IP address) to Google and the processing of this data by Google by downloading and installing the browser plugin available at the following link. The current link is https://tools.google.com/dlpage/gaoptout.

Further information on data protection at Google Analytics can be found here: www.google.com/intl/de/analytics/privacyoverview.html

## 3.4. Typekit from Adobe

For the presentation of our Website we use a font as a Typekit service from Adobe. In the course of providing the Typekit service, no cookies are placed or used to provide the font.

Additional information about Adobe Typekit privacy can be found at the following link: <u>http://www.adobe.com/de/privacy/typekit.html</u>. To prevent Typekit from collecting data, please disable JavaScript in your browser. However, we would like to point out that in this case you may not be able to use all functions of this Website to their full extent.

- 4. How do we entrust others to process, provide, transfer, publicly disclose and store your Personal Information
- 4.1. Entrusting others to process your Personal Information

In certain cases, we use so-called data processors that support our activities with their services (this includes services to store information, technical support, marketing, analysis). These third-party service providers have access to your Personal Information needed to perform their duties but cannot use this information for any other purpose. These service providers are obliged to process Personal Information in accordance with the provisions of this Policy and our instructions.

4.2. Providing your Personal Information to others

We will not provide your Personal Information to any company, organization or individual other than us unless we obtain your separate consent. When we provide your Personal Information to other personal information processors based on your consent, we will inform you of the recipient's name, contact information, processing purpose, processing method and type of Personal Information.

4.3. Transfer of your Personal Information in special circumstances

In the case of mergers and acquisitions, division, asset transfers or similar transactions, dissolution or declaration of bankruptcy, etc., these may involve the transfer of your Personal Information. In such a case, we will inform you of the name and contact information of companies and organizations that receive your Personal Information and require the companies and organizations to continue to be bound by this Policy. If the company or organization wishes to use the Personal Information for other purposes than described in this Policy, we will require it to ask you for your consent to process your Personal Information again.

4.4. Public disclosure of your Personal Information

We will not disclose your Personal Information publicly, except in circumstances where you consent to such public disclosure or in the event that we must publicly disclose your Personal Information in accordance with the requirements of laws, regulations, mandatory administrative enforcement or judicial requirements.

4.5. Storage of your Personal Information

We will store your Personal Information on servers in Germany just for the time period that we offer you the Website. After this period, your Personal Information will be automatically purged from our systems unless legislation requires us to keep your Personal Information for a diverging period.

- 5. How do we protect your Personal Information
- 5.1. We use safety protection measures that meet the industry standards to protect your Personal Information and prevent unauthorized access and divulgence, falsification and loss. Our protection measures include for example:
  - Formulating internal management systems and operating procedures;
  - · Implementing category-based management of personal information;
  - Taking corresponding technical security measures such as encryption and deidentification;
  - Reasonably determining the authority to process personal information and conducting security education and training for relevant employees on a regular basis;
  - Formulating and organizing the implementation of emergency plans for personal

information security incidents; and

- Other measures stipulated by laws and administrative regulations.
- 5.2. We take all reasonable and feasible measures to ensure that we only collect Personal Information necessary for our purposes.
- 5.3. We will try our best to warrant or guarantee the security of our services or any information you provide to us through our Website. However, please be aware that despite our efforts, no Personal Information security measures can guarantee one hundred per cent security at all times.
- 5.4. In the unfortunate event of a Personal Information security incident, we will act in accordance with the requirements of laws and regulations and take the corresponding legal responsibilities. We will inform you in a timely manner about the basic situation of the security incident, measures we have taken or will take to deal with the incident and advice how you can prevent and reduce risks independently. We will inform you in time by mail, letter, telephone or push notice. If it is difficult for us to inform each person one by one, we will make an announcement in a reasonable and effective way.
- 5.5. At the same time, we will also take the initiative to report the disposal of a Personal Information security event in accordance with the requirements of the regulatory authorities.
- 6. Your rights

In accordance with relevant laws, regulations and standards in China and other countries and regions, we ensure that you exercise the following rights for your Personal Information.

6.1. Access to your Personal Information - Information right

You have the right to access your Personal Information processed by us unless stipulated otherwise in laws and regulations.

6.2. Correct and supplement your Personal Information

When you find that we are dealing with your Personal Information wrong or incomplete, you have the right to ask us to make corrections or supplementary.

6.3. Deletion of your Personal Information

In the following cases, you can request us to delete your Personal Information:

- If we deal with your Personal Information in violation of laws and regulations;
- If we collect and use your Personal Information, but have not received your consent;
- If we deal with your Personal Information in violation of an agreement with you;
- If you no longer use our Website;

- If you withdraw your consent; or
- If we no longer provide you with services, or the storage period has expired.

If the storage period as stipulated by laws and administrative regulations does not expire, or the deletion of personal information is difficult to be realized technically, we will stop the processing other than storage and necessary security protection measures.

6.4. Change the scope of your authorization

For the collection and use of additional Personal Information, you have the right to revoke consent granted with effect for the future. This means that your personal data will no longer be processed for this purpose and will also be deleted. Please note that that the revocation does not impact the legality of processing for which consent has been granted up to the revocation. If you wish to retract your consent, simply send us an email to dataprotection@Gehring-group.com with your name and contact. You do not have to state a reason for your retraction.

6.5. Receive a copy of Personal Information stored by us

You have the right to receive a copy of your Personal Information stored by us unless if there are circumstances in which your Personal Information should be kept confidential as required by laws or administrative regulations or does not need to be informed.

6.6. Restrict and object to the processing

You have the right to restrict or refuse us to process your Personal Information, unless otherwise provided for by laws and administrative regulations.

6.7. How to exercise your rights

If you want to exercise any of your rights mentioned above, you can send an email to <u>dataprotection@Gehring-group.com</u> at any time. We will reply to your request generally within 30 days.

To ensure security, you may need to provide a written request or prove your identity in other ways. We may first ask you to verify your identity and then reprocess your request.

7. How do we deal with Sensitive Personal Information

Please note that no Sensitive Personal Information will be requested for the use of the Website. If we find ourselves collecting Sensitive Personal Information, we will try to delete relevant data as soon as possible.

8. How does your Personal Information shift around the world

- 8.1. We will only process your Personal Information in the People's Republic of China and the European Union. We will not transmit your Personal Information to other countries without your separate consent.
- 9. How to update this policy
- 9.1. Our Policy may change.
- 9.2. Without your explicit consent, we will not reduce your rights in accordance with this Policy. We will publish any changes to this Policy on this Website.
- 9.3. For major changes, we will also provide additional notices.

The major changes referred to in this Policy include, but are not limited to:

- Significant changes have taken place in our service model, such as the purpose of processing Personal Information, the type of Personal Information processed, the use of Personal Information, etc.;
- We have undergone major changes in terms of ownership structure, organizational structure, and so on. Such as changes in the ownership structure caused by business adjustments, bankruptcy or mergers, etc.;
- The main objects of Personal Information sharing, transfer or disclosure are changed;
- Your right to participate in the handling of Personal Information and the manner in which it is exercised has undergone significant changes;
- Internal responsibilities for Personal Information security, contact methods and complaint channels change; and
- The Personal Information security impact assessment report indicates that there is a high risk associated with our Website.
- 9.4. We will also file the old version of this Policy for you to consult.
- 10. Dispute resolution
- 10.1. Do you have any questions with regard to the handling of your personal data or data protection? Do you have any suggestions or a matter you want to discuss? Please speak to our responsible person for data protection about this:

In China:

Person in charge for persona information protection: Cai Linling Address: Part B1, First Floor, No. 27 Workshop, No. 500 Fu Te Rd. East Two, Waigaoqiao Free Trade Zone, 2000131 Shanghai P. R. China Email: <u>dataprotection@Gehring-group.com</u>

In Europe:

Address: Gehringstraße 28 Industrial Park Nellingen-Zinsholz 73760 Ostfildern Germany Email: <u>dataprotection@Gehring-group.com</u>

In general, we respond within 30 days.

10.2. If you are not satisfied with our reply, especially if you think the way we process your Personal Information violates your legitimate rights and interests, you can log a complaint at the respective data protection government authorities. Furthermore, you can also find a solution through the responsible courts in the location of business.