



## PRIVACY NOTICE

Should you have any questions or concerns regarding this policy, please contact the Data Protection Manager at [DataProtectionManager@Snapon.com](mailto:DataProtectionManager@Snapon.com).

The protection of your privacy in the processing of personal data is an important concern to which we pay special attention during our business processes.

This Privacy Policy answers frequently asked questions about the kinds of data we collect from Suppliers and how it is used. Please read the following carefully to understand our views and practices regarding personal data and how we will treat it.

### 1. What personal data do we gather?

We collect and process a range of personal data including:

#### Data you give to us:

- This is information about your employees that you or they give to us by filling in forms on our site or by corresponding with us by phone, e-mail, in person or at trade shows or events or otherwise. The information given to us may include for example: name, title, address, business telephone number, purchase information, business email address, fax number, country of origin, financial and tax information, business registration information, business-related information, and survey responses.

#### Data we collect from other sources:

- We also work with third parties including, for example, business partners, sub-contractors in technical, payment and delivery services, analytics providers, search information providers, data aggregators, and credit reference agencies.

### 2. How is that personal data used by us?

We may use personal data held about you in the following ways:

- **Business Uses:** to fulfil a transaction or to carry out our obligations arising from any contracts you enter into with us; to carry out a credit check; to send renewal notices; to establish and manage accounts; to manage compliance programs in accordance with applicable laws, including, without limitation, compliance with Anti-Corruption Laws and product regulatory compliance laws, rules, orders and regulations, and to analyse and develop new products and services.
- **Providing Support:** to provide customer support, manage warranties and returns or other quality concerns.

- **Protecting our Rights and Property:** to protect our rights or property or that of our business partners, franchisees, dealers, suppliers, customers or others when we have reasonable grounds to believe that such rights or property have been or could be affected; to recover debts; to prevent, detect, identify, investigate, respond, and protect against potential or actual claims, liabilities and prohibited behaviour or activities.
- **Information for our Business Partners:** to administer and develop our business relationship with you, sharing information with our group, to enter into or perform a transaction with you;
- **Surveys:** to request and receive from you information regarding your role as a Supplier.

### 3. On what legal basis do we gather and use my data?

We gather and use your personal data for the performance of a contract to which you are party or in order to take steps at your request prior to entering into a contract; (ii) our legitimate interests and in compliance with your fundamental rights and freedoms; and/or (iii) because of a legal obligation.

### 4. Is my personal data transferred or provided to third parties?

Snap-on Incorporated is a global organization with affiliates, subsidiaries, business processes, management structures and technical systems that cross borders. As such, we will share the personal data we collect with other companies within the Snap-on Incorporated group and transfer it to countries in the world where we do business in connection with the uses identified above and in accordance with this Privacy Policy.

Subject to their compliance with applicable legislation and/or this Privacy Policy, we will also disclose your personal data to selected non-affiliated third parties, including those that perform transaction processing or servicing functions, credit reference agencies, debt collection agencies, and/or other companies that provide services on our behalf, professional service providers (including translators, legal advisers and accountants), adverse parties who have a legal right to receive such information and their counsel and experts, law enforcement authorities, and other government authorities.

We will disclose such data for the following purposes:

- to service the legal agreement between us and third parties;
- to manage client, dealer, franchisee, and customer accounts effectively, to service and process transactions, and to manage our business;
- as required by law in cases where we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, or to protect our rights, property, or safety, as well as that of our customers, clients, dealers, franchisees or others or in response to a court order, subpoena or a law enforcement agency's request.

Circumstances may arise where, whether for strategic or other business reasons, we decide to sell, buy, merge or otherwise reorganise our business. Such a transaction may involve the disclosure of

personal data to prospective or actual purchasers, or the receipt of such data from sellers. It is our practice to seek appropriate protection for data in these types of transactions.

**5. How long will my personal data be kept for?**

We will endeavour not to keep your personal data in a form that allows you to be identified for any longer than is reasonably necessary for achieving the permitted purposes. This means that data will be destroyed or erased from our systems or anonymized when it has reached the applicable retention period.

**6. Will my personal data be transferred to other countries?**

Personal data may be transferred outside of the European Economic Area (“EEA”) to members of our group and other third parties as set out above, provided that certain conditions as set out in the applicable legislation are complied with. Your personal data will also be processed by staff operating outside the EEA who work for us. This includes staff engaged in, among other things, the fulfilment of your order and the provision of support services.

We are party to a data transfer agreement with the members of our group and we will (i) keep that document up to date with current law, and (ii) only engage in personal data transfers from the EEA to outside the EEA in accordance with such an agreement or an alternative means of transfer in compliance with data protection legislation. For more information on the safeguards in place, please contact the Data Protection Manager at [DataProtectionManager@Snapon.com](mailto:DataProtectionManager@Snapon.com).

**7. What security measures are in place to protect my personal data?**

We endeavour to protect the security of your personal data. We will seek to maintain administrative, technical and physical safeguards to protect against loss, misuse or unauthorized access, disclosure, alteration or destruction of your personal data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we endeavour to protect your personal data, we cannot guarantee the security of your personal data transmitted to us or stored on our systems; any transmission is at your own risk. Once we have received your personal data, we will use procedures and security features to try to prevent unauthorised access. These procedures include physical, electronic, and managerial procedures.

**8. How do I update or access my personal data?**

We ask that you keep your data as up-to-date as possible so you may get the maximum benefit from us. For questions related to updating or changing your information, please contact your typical Snap-on contact, if you do not have or do not recall your contact, please contact the Data Protection Manager at [DataProtectionManager@snapon.com](mailto:DataProtectionManager@snapon.com).

**9. What rights do I have in relation to my personal data?**

Depending on the circumstances, you may have the right to:

- request access to any personal data we hold about you;
- ask to have inaccurate data held about you amended or updated;
- ask to have your data erased or to restrict processing in certain limited situations;

- request the porting of your personal data to another organization in control of your personal data; and/or
- object to any decision that significantly affects you being taken solely by a computer or other automated process.

If you wish to make a formal request for information we hold about you, you can contact us, at <https://compliance.snapon.com/GDPR/RequestForm?co=SnapOnSuppliers&dl=en>

**10. What should I do if I think there has been a breach of the applicable data protection legislation or this Privacy Policy?**

If you consider that the applicable data protection legislation or this policy has not been followed, then you should raise the matter with the Data Protection Manager at [DataProtectionManager@Snapon.com](mailto:DataProtectionManager@Snapon.com). Any breach will be taken seriously.

**11. Modifications to this Privacy Statement**

We reserve the right to modify this Privacy Policy at any time and without prior notice. We will post any changes on our website so please check regularly for the most recent version of our Privacy Policy. Adopted as of May 25, 2018.