

PRIVACY POLICY

Diagnostics, an operating group within Snap-on UK Holdings Limited is part of the Snap-on Incorporated group of companies ("Snap-on Group"), which processes your information. Diagnostics, an operating group within Snap-on UK Holdings Limited is referred to as "we" in this privacy policy.

The protection of your personal information is an important concern to which we pay special attention.

This privacy policy answers frequently asked questions about the kinds of personal information we collect from you and how it is used.

Please note, the privacy practices set forth in this privacy policy are for Diagnostics, an operating group within Snap-on UK Holdings Limited only. Other companies within the Snap-on Group may have websites and products that collect and use different personal information. Additionally, if you link to or otherwise visit any other websites, please review the privacy policies posted on those sites.

Should you have any questions or concerns regarding this privacy policy, please contact the data protection manager at: DataProtectionManager@snapon.com.

1. What types of personal information do we gather?

We may collect and process, and have collected and processed in the last 12 months, a range of personal information including:

- **Identifiers:** Such as a real name, alias, postal address, telephone number, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number, other state or national identification number(s), your signature, physical characteristics or description, insurance policy number or other similar unique personal identifiers.
- **Commercial Information:** Such as transaction and purchase information and history.
- **Financial Information:** Such as your bank account number, credit card number, debit card number or any other financial information.
- **Technical and Usage Information:** Such as login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and information on other technology on the devices using our websites or products; information about how you use our website, products and services, such as browsing history, search history, or other information on interactions with our websites, applications, products and services. For detailed information on the tracking technologies we use on this website, see [How do we use cookies?](#).
- **Educational or Professional/Employment-Related Information:** Such as education or training history, work history and prior employers.

- **Sensory information:** Such as audio, electronic, visual and similar information, such as call and video recordings.
- **Geolocation Information:** Such as device and internet protocol address location.
- **Inference Information:** For example preference profiles drawn from any of the personal information listed above.
- **We do not intend to collect personal information of Children:** We do not knowingly collect personal information from children under 16. Our website is not intended for children under 16 years of age. If you are under 16, do not use or provide any information on this website or through any of its features. If you believe we might have any information from or about a child under 16, please contact us at DataProtectionManager@snapon.com.

2. What are the sources of personal information we have gathered?

We collect personal information from a variety of sources, including:

- **From You.** You may directly give us personal information when you:
 - Apply for, purchase, register or use our products and services;
 - Apply for a role with us;
 - Receive customer support;
 - Create an account on our website;
 - Subscribe to our publications;
 - Request marketing be sent to you;
 - Enter a competition, promotion or survey;
 - Correspond with us in person at trade shows, events, or otherwise;
 - Interact with us as a potential or existing franchisee or as an employee of a franchisee;
 - Give us feedback or provide us other information when you contact us; or
 - When you connect your social media account to your account with us.
- **From automated technologies or interactions.** As you interact with our website or application, or email campaigns, we may automatically collect Technical and Usage Information (more fully described in the “What types of personal information do we gather?” Section.) We collect this data by using cookies, server logs and other similar technologies. For detailed information on the technologies we use on this website or in email campaigns, see [How do we use cookies?](#).
- **From third parties or publicly available sources.** We will receive personal information from various third parties that confirmed they are authorized to share it with us or other public sources, such as:
 - Consumer reporting agencies, credit reference agencies and publicly available databases;
 - Auto repair shops and auto dealers who use our products or services;
 - Snap-Tools franchisees;

- Recruitment agencies and referees;
- Insurance companies and brokers;
- Trade bodies;
- Other Snap-on Group companies that you may interact with through other websites, products, services, or social media pages;
- Search information providers;
- Advertising networks;
- Internet service providers;
- Meeting services;
- Data Analytics Providers;
- Operating systems and platforms;
- Social networks; or
- Data brokers;

3. **How is that personal information used by us?**

We may use your personal information in the following ways:

- **Business Uses, such as:**
 - Register you as a new customer;
 - Conduct recruitment;
 - Process and deliver your order, manage your subscriptions, or carry out our obligations arising from any other contracts you enter into with us;
 - Manage payments, fees and charges and collect and recover money owed to us;
 - Managing our relationship with you by sending you renewal notices, notifying you of product or service information, asking you to leave a review or take a survey, or enabling you to partake in a prize draw or competition;
 - Fulfil your requests, answer your questions, respond to your comments, and measure how effectively we address your concerns;
 - Analyse and develop new products and services, or make suggestions and recommendations to you about goods and services that may be of interest to you;
 - Provide customer support; or
 - Fulfil any legal obligations we may have.
- **Monitoring & Recording:** to handle any calls, chats or other interactions with us, including by the customer services team. Please be aware that it is our general practice to monitor and in some cases record such interactions for staff training or quality assurance purposes or to retain evidence of a particular transaction or interaction.
- **Mobile Applications:** to make available mobile applications, to implement social media platforms on some of our websites, to register on these platforms. Please refer also to any supplemental privacy policy that may be available with respect to these third party social media platforms.
- **Website Experience:** for the technical administration of the website; for internal operations; for customer administration; for product surveys; for troubleshooting; for

information analysis, information analytics, testing, and research and development purposes; to ensure that content from our site is presented in the most effective manner for you and for your computer; and as part of our efforts to keep our site safe and secure.

- **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, Dealers and Snap-on Tools Franchisees:** to administer and develop our business relationship with you, the business partner, dealer or franchisee you represent, including sharing information with our group, to enter into or perform a transaction with you, to contact you as part of satisfaction surveys or for market research purposes.
- **Product development:** We may use non-identifying and aggregate information to gather information for product management and development. For example, we may tell our sales and marketing staff that X number of individuals visited a certain area on our web site, or that Y number of software licenses were ordered during a particular time period. This aggregate information may also be shared with our affiliates and independent dealers.
- **Marketing:** to communicate about, and administer participation in, special events, programs, surveys, contests, sweepstakes, and other offers and promotions; to provide you with information about other goods and services we offer, or offered by others, that are similar to those that you have already purchased or enquired about and to send informational or promotional email messages to you, which you may opt out of receiving as described below.

4. On what legal basis do we gather and use personal information of UK/EU/EEA residents?

We gather and use your personal information for either (i) 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, and/or (ii) for direct marketing purposes, and/or (iii) our legitimate interests and in compliance with your fundamental rights and freedoms and/or (iv) because of a legal obligation, and/or (v) to protect your vital interests.

5. Is my personal information disclosed to third parties?

We may disclose Personal Information with the following categories of third parties:

- **"Affiliates."** We share with our affiliates for the purposes described in this Privacy Policy.
- **"Service Providers."** We share with our trusted third-party service providers, to facilitate services they provide to us, such as internet services, website hosting, data analytics, payment processing, order fulfilment, information technology and related infrastructure

provision, customer service, email delivery, marketing, auditing, background checks, and other services.

- **“Social Networks”** We share with social network platforms, who use the data we share in accordance with their own privacy policies.
- **“Business Partners.”** We share with our trusted business partners.
- **“Franchisees.”** We share information with our Franchisees.
- **“Marketing Partners.”** We share with our marketing partners to permit them to send you marketing communications, consistent with your choices.
- **“Credit Bureaus.”** We share information about your credit history with us with credit bureaus.
- **“Legal Authorities.”** We share with public and government authorities, including regulators and law enforcement, to respond to requests, as well as to protect and defend legal rights.
- **“Other Parties in Litigation.”** We share information in the context of litigation discovery and in response to subpoenas and court orders.

In the preceding 12 months, we disclosed for our operational business purposes the following categories of Personal Information to the following categories of third parties:

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers	Affiliates, Business Partners, Credit Bureaus, Franchisees, Legal Authorities, Marketing Partners, Other Parties in Litigation, Service Providers, Social Networks
Commercial Information	Affiliates, Business Partners, Franchisees, Service Providers
Financial Information	Affiliates, Business Partners, Credit Bureaus, Legal Authorities, Other Parties in Litigation, Service Providers
Technical and Usage Information	Affiliates, Business Partners, Franchisees, Marketing Partners, Service Providers
Educational Information	Affiliates, Business Partners, Franchisees
Professional/Employment Related Information	Affiliates
Sensory Information	Affiliates
Inference Information	Affiliates, Other Parties in Litigation

6. How long will my personal information be kept for?

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

7. Will my personal information be transferred to other countries?

We are a global company and we may process, store and transfer personal information we collect to a country outside your own, provided that certain conditions as set out in the applicable legislation are complied with.

We are party to an information transfer agreement with the members of the Snap-on Group and we will keep that document up to date with current law. For more information on the safeguards in place, please contact DataProtectionManager@snapon.com.

8. What security measures are in place to protect my personal information?

We endeavour to protect the security of your personal information. 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 information.

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

9. How do I update or access my personal information?

We ask that you keep your information as up-to-date as possible so you may get the maximum benefit from us.

If you have a website account with us then you can access and correct personal information that we keep in your online account by clicking on "Your Account" and entering your user id and password. For other questions related to updating or changing your account information or if any errors in your personal information cannot be corrected by accessing "Your Account", please send a request to serviceuk@snapon.com.

10. What specific rights do I have in relation to my personal information based on my residency?

- **UK, European Union and European Economic Area Residents.** Depending on the circumstances, the General Data Protection Regulation "GDPR" may provide you the right to:
 - request access to any personal information we hold about you;
 - object to the processing of your information for direct-marketing purposes;
 - ask to have inaccurate information held about you amended or updated;
 - ask to have your information erased or to restrict processing in certain limited situations;
 - request the porting of your personal information to another organisation in control of your personal information; and/or
 - object to any decision that significantly affects you being taken solely by a computer or other automated process.

If you are a resident of the European Union or European Economic Area that wishes to make a formal request for information we hold about you, you can contact us [here](#). We will respond to your request consistent with the GDPR.

11. How do I opt out of being contacted for promotional purposes?

You have the right to ask us not to send you marketing communications. We will usually inform you (before collecting the personal information) if we intend to use your personal information for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect personal information. You can also exercise the right to prevent such processing at any time by:

- Clicking the unsubscribe link in any informational or promotional email that we send you.
- Calling our Customer Service Center at +44 (0)1553 692422 if you have any questions about changing your contact preference or require assistance in removing your name from our subscription lists.

12. How do we use cookies?

- **What are cookies:** Cookies are small text files that are placed on your computer by websites that you visit, and are widely used to make websites work, or work more efficiently.

If you receive marketing or newsletter emails from us, they are sent using our service provider DotDigital. The DotDigital privacy notice can be found here: <https://dotdigital.com/terms/privacy-policy>. Emails from this service may include tracking pixels (also known as web beacons) to enable us to recognize when someone has opened them and measure the success of campaigns. DotDigital's Cookie Statement can be found here: <https://dotdigital.com/terms/cookie-policy>.

- **How do I change my cookie settings:**
 - Most browsers automatically accept cookies. However, you can prevent cookies from being stored on your computer or device by setting your browser to not accept cookies. The exact instructions for this can be found in the manual for your browser. You can delete cookies already on your computer or device at any time. If you choose to set your browser settings so cookies are not accepted, then you can still visit our website, apps and online services, however doing so may affect your use of some parts of our web services, apps and online services and reduce availability of the services provided by our website, apps and online services.
 - You can change your cookie preferences for any of our websites, go to the website footer and select cookie settings.
 - To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

- You can disable tracking pixels in our email campaigns by blocking remote images from being displayed by default in your mail client.

- **How does this website use cookies:** The table below explains the cookies we use and why.

Cookie	Name	Purpose	More information
Google Analytics	_ga	Used to distinguish users.	https://developers.google.com/analytics/devguides/collection/gtagjs/cookieusage Expiration: Two years
Google Analytics	_gid	Used to distinguish users.	https://developers.google.com/analytics/devguides/collection/gtagjs/cookieusage Expiration: 24 hours
Google Analytics	_utma	Distinguish users and sessions.	Expiration: Two years
Google Analytics	_utmc	Determines whether user was in a new session/visit.	Expiration: When browser session ends
Google Analytics	_utmz	Stores the traffic source that explains how the user reached the site.	Expiration: Six months
Google Analytics	_gat	Used to throttle request rate. If Google Analytics is deployed via Google Tag Manager, this cookie will be named _dc_gtm_<property-id>.	https://developers.google.com/analytics/devguides/collection/gtagjs/cookieusage Expiration: One minute
userReferer		This is the page the form submitted	https://www.jotform.com/privacy/ Expiration: Upon completion of the form
ASP.NET Session ID Cookie	asp.net_sessionid	Cookie that ASP.NET uses to store a unique identifier for your session. The session cookie is not persisted on your hard disk. Cookie does identify the users session, but does not store identifying information.	Cookie marked as available only over secure connection and http only. Expiration: When user ends browser session
Secure Access Cookie	SecureAccess[DocID]	This cookie is used by the Enhanced Forms Editor block when setting up gated content. Once a user completes a form setup as a gate to content access, the cookie is set for the duration specified in the Enhanced Forms Editor block (default of 1 year). Once the cookie is set, the user does not need to fill out the form again when returning to the site until the cookie expires. Does not store user identifying information.	Expiration: Setting Access Period of 0 in Enhanced Forms Editor block makes cookie good for session. -1 expires immediately. Default expiration is 1 year if not specified.

Except for essential cookies, all cookies will expire after a maximum of 2 years.

13. Who should I contact with concerns or questions about this Privacy Policy or applicable data protection legislation?

If you have concerns or questions about this Privacy Policy or you believe that the applicable data protection legislation or this policy has not been followed, then you should raise the matter with our Data Protection Manager at DataProtectionManager@snapon.com.

If you are a citizen of the European Union or European Economic Area, you may make a complaint at any time to the applicable supervisory authority for data protection issues. We have appointed a data protection manager who is responsible for addressing any reported data protection issues related to GDPR, and we would like the opportunity to respond to your concerns before you approach a supervisory authority so please feel free to contact the data protection manager at DataProtectionManager@snapon.com.

14. Modifications to this Privacy Statement

We reserve the right to modify this Privacy Policy at any time and without prior notice, subject to applicable legal requirements to notify you or obtain your consent. We will post any changes on our website so please check regularly for the most recent version of our Privacy Policy. This version is dated, August 1st 2021].

15. Links

This site contains links to other sites. Please be aware that We are not responsible for the content or privacy practices of those sites, and our Privacy Policy does not apply to information collected from you by those sites. We encourage you to read the privacy statements of each site that collects information from you. When you are leaving our site via a link to interact with a site that is not governed by our Privacy Policy, a new browser window will open. If your interaction with our site will require sending your information to a third-party site that is not governed by our privacy policy, we will clearly inform you before your information is sent.