



## **PRIVACY AND COOKIES POLICY**

This Privacy and Cookies Policy describes how Sarclad Limited, of Advanced Manufacturing Park, Whittle Way, Rotherham, S60 5BL (the "**Company**") collects, uses, shares, and otherwise processes individually identifiable data about visitors to this Site (defined below) as well as contact persons for our customers, distributors, sales representatives, end users, and suppliers ("**Personal Data**"). This Privacy Policy applies to Personal Data that we collect through our public websites, mobile applications, and other online properties (each, a "**Site**"), as well as through trade shows and offline means.

### **Summary of Key Points**

<b>Collection</b>	As a business to business (" <b>B2B</b> ") organization, we collect name, contact details, and other Personal Data related to our commercial relationships. <a href="#">Click here to learn more.</a>
<b>Use</b>	We use Personal Data to perform transactions and respond to inquiries, to manage accounts and maintain business operations, to provide relevant marketing, and to fulfill other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Sharing</b>	We share Personal Data as necessary to perform transactions and respond to requests, and to fulfil other business and compliance purposes. <a href="#">Click here to learn more.</a>
<b>Marketing choices</b>	You have control on how we use Personal Data for marketing. <a href="#">Click here to learn more.</a>
<b>Cookies</b>	We use cookies on our Sites, and provide choices on use of cookies, including third party targeting and advertising. <a href="#">Click here to learn more.</a>
<b>Data subject rights</b>	You have certain rights to request access, rectification, deletion, objection, or other actions regarding your Personal Data where required by applicable law. <a href="#">Click here to learn more.</a>
<b>Data security</b>	We maintain technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction of Personal Data. <a href="#">Click here to learn more.</a>
<b>Cross-border data transfers</b>	We provide appropriate protections for cross-border transfers where specified by law. <a href="#">Click here to learn more.</a>
<b>Other issues</b>	We provide other information in this Privacy & Cookies Statement about: (i) the legal basis for our collection and processing of Personal Data, (ii) the consequences for not providing Personal Data, (iii) automated decision-making, (iv) do-not-track (DNT) signals, (v) data retention, (vi) links to third party websites, (vii) employee and contractor issues; and (viii) changes to this Privacy & Cookies Statement. <a href="#">Click here to learn more.</a>
<b>Contact us</b>	Please contact us as detailed below with any questions. <a href="#">Click here to learn more.</a>

### **Collection of Personal Data**

We collect the following categories of Personal Data about the categories of individuals described above:

**Basic Data:** Name, title, company, job responsibilities, phone number, mailing address, email address, and contact details.

**Registration Data:** Newsletter requests, subscriptions, downloads, and username/passwords.

**Transaction Data:** Transaction history, payment details, and performance data.

**Marketing Data:** Data about individual participation in trade shows and conferences, credentials, associations, product interests, and preferences.



**Compliance Data:** Government identifiers, passports, beneficial ownership data, and due diligence data.

**Job Applicant Data:** Data provided by job applicants or others on our Sites or offline means in connection with employment opportunities.

**Device Data:** Computer Internet Protocol (IP) address, unique device identifier (UDID), cookies and other data linked to a device, and data about usage of our Sites (Usage Data). Note, however, we do not consider Device Data to be Personal Data except where we link it to you as individual or where applicable law provides otherwise.

### Use of Personal Data

The purposes for which we use Personal Data are as follows:

- To **perform transactions and respond to inquiries** we use basic data, registration data, transaction data, and device data.
- To **manage accounts and maintain business operations** we use basic data, registration data, transaction data, and device data.
- To **make our Sites more intuitive and easy to use** we use device data.
- To **protect the security and effective functioning of our Sites and information technology systems** we use basic data, registration data, transaction data, and device data.
- To **provide relevant marketing** we use marketing data, basic data, registration data, transaction data, and device data.
- To **address compliance and legal obligations** we use compliance data, basic data, registration data, transaction data, and device data.
- To **consider individuals for employment and contractor opportunities and manage on-boarding procedures** we use job applicant data and compliance data.

### Sharing of Personal Data

We share Personal Data with the following categories of recipients:

- **Within the affiliated group:** We share Personal Data with our ultimate parent company, Heico Holding, Inc. in the United States (controller) and its subsidiaries, (collectively, "HEICO") as necessary for the purposes identified above.
- **Distributors and sales representatives:** We share Personal Data with distributors and sales representatives in order to: perform transactions and respond to inquiries; manage accounts and maintain our business operations; provide relevant marketing; and address compliance and legal obligations.
- **Suppliers and service providers:** We share Personal Data with suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above. We require such parties by contract to provide reasonable security for Personal Data and to use and process such Personal Data on our behalf only.
- **Auditors, advisors, and financial institutions:** We share Personal Data with auditors for the performance of audit functions, with advisors for the provision of legal and other advice, and with financial institutions in connection with payment and other transactions.
- **Corporate purchasers:** We share Personal Data with any corporate purchaser or prospect to the extent permitted by law as part of any merger, acquisition, sale of HEICO assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which Personal Data would be transferred as an asset of HEICO.
- **Mandatory disclosures and legal claims:** We share Personal Data in order to comply with any subpoena, court order or other legal process, or other governmental request. We also share Personal Data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

If you have questions about the parties with which we share Personal Data, please contact us as specified below.

## **Marketing Choices**

**You have control regarding our use of Personal Data for directing marketing.** If you no longer wish to receive any marketing communications, remain on a mailing list to which you previously subscribed, or receive any other marketing communication, **you can choose to not receive such communications at any time.** Please follow the unsubscribe link in the relevant communication or contact us as per below.

## **Cookies**

We use and allow certain third parties to use cookies, web beacons, and similar tracking technologies (collectively, "cookies") on our Sites.

### *What are cookies?*

Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website. More information about cookies and how they work is available at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### *How do we use cookies?*

We use cookies to provide the Sites and services, gather information about your usage patterns when you navigate this Sites in order to enhance your personalized experience, and to understand usage patterns to improve our Sites, products, and services. We also allow certain third parties to place cookies on our Sites in order to collect information about your online activities on our Sites over time and across different websites you visit. This information is used to provide advertising tailored to your interests on websites you visit, also known as interest based advertising, and to analyze the effectiveness of such advertising.

Cookies on our Sites are generally divided into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of our Sites. They include, for example, cookies that enable you to log into secure areas. These cookies are session cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of our Sites and understand how such users navigate through our Sites. This helps to improve how our Sites works, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser.
- **Functional Cookies:** These improve the functional performance of our Sites and make it easier for you to use. For example, cookies are used to remember that you have previously visited the Sites and asked to remain logged into it. These cookies qualify as persistent cookies, because they remain on your device for us to use during a next visit to our Sites. You can delete these cookies via your browser settings.
- **Targeting Cookies:** These record your visit to our Sites, the pages you have visited and the links you have followed to recognize you as a previous visitor and to track your activity on the Sites and other websites you visit. These cookies qualify as persistent cookies, because they remain on your device for us to use during a next visit to our Sites. You can delete these cookies via your browser settings. See below for further details on how you can control third party targeting cookies.

### *What are your options if you do not want cookies on your computer?*

You can review your Internet browser settings, typically under the sections "Help" or "Internet Options," to exercise choices you have for certain Cookies. If you disable or delete certain Cookies in your Internet browser settings, you might not be able to access or use important functions or features of this Sites, and you may be required to re-enter your log-in details.

To learn more about certain cookies used for interest based advertising by third parties, including through cross-device tracking, and to exercise certain choices regarding such cookies, please visit the [Digital Advertising Alliance](#), [Network Advertising Initiative](#), [Digital Advertising Alliance-Canada](#), [European Interactive Digital Advertising Alliance](#) or your device settings for if you have the DAA or other mobile app.

## **Data Subject Rights**

Where required by applicable law, you have the right to obtain confirmation of the existence of certain Personal Data relating to you, to verify its content, origin, and accuracy, as well as the right to access, review, obtain a copy, port, delete, or to block or withdraw consent to the processing of certain Personal Data (without affecting the lawfulness of processing based on consent before its withdrawal), by contacting us as detailed below. **Additionally, you have the right to object to our use of Personal Data for direct marketing and in certain other situations at any time. Contact us below for more details.** Please note that we need to retain certain Personal Data as required or permitted by applicable law.

## **Data Security**

We maintain technical and organizational measures to protect Personal Data from loss, misuse, alteration, or unintentional destruction. However, no security measure can guarantee against compromise. You also have an important role in protecting Personal Data. You should not share your username and password with anyone, and you should not re-use passwords across more than one Sites. If you have any reason to believe that your username or password has been compromised, please contact us as detailed below.

## **Cross-Border Data Transfers**

We transfer Personal Data to various jurisdictions as necessary for the purposes described above, including to jurisdictions that may not provide the same level of data protection as your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers. With respect to transfers originating from the European Economic Area ("**EEA**"), we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers as required by applicable law. Where required by such laws, you may request a copy of the suitable mechanisms we have in place by contacting us as detailed below.

## **Other Issues**

*(i) What is the legal basis of processing?*

Some jurisdictions require an explanation of the legal basis for the collection and processing of Personal Data. We have several different legal grounds on which we collect and process Personal Data, including: (a) as necessary to perform a transaction (such as when we respond to your requests); (b) as necessary to comply with a legal obligation (such as when we use Personal Data for record keeping to substantiate tax liability); (c) consent (where you have provided consent as appropriate under applicable law); and (d) necessary for legitimate interests (such as when we act to maintain our business generally). With respect to legitimate interests, given that we are a B2B company, we typically collect and process limited Personal Data about customer contacts and other individuals acting in their business capacities, as part of our overall effort to reduce the privacy impact on individuals.

*(ii) What are the consequences of not providing Personal Data?*

You are not required to provide all Personal Data identified in this Privacy and Cookies Policy to use our Sites or to interact with us offline, but certain functionality will not be available if you do not provide Personal Data. If you do not provide Personal Data, we may not be able to respond to your request, perform a transaction with you, or provide you with marketing that we believe you would find valuable.

*(iii) Do we engage in automated decision-making without human intervention?*

We do not use automated decision-making without human intervention, including profiling, in a way that produces legal effects concerning you or otherwise significantly affects you.

*(iv) Does the Sites honor do not track ("DNT") signals sent via browsers?*

Given the divergent practices of organizations that offer browsers and the lack of a standard in the marketplace, we generally do not respond to DNT signals at this time.

*(v) How long do we retain Personal Data?*

We typically retain Personal Data related to marketing activities for as long as you accept marketing communications from us, and we will securely delete such data in accordance with applicable law upon request. For Personal Data that we collect and process for other purposes, we typically retain such Personal Data for no longer than for the period necessary to fulfill the purposes outlined in this Privacy and Cookies Policy and as otherwise needed to address tax, corporate, compliance, litigation, and other legal rights and obligations.

*(vi) Are third party websites governed by this Privacy And Cookies Policy?*

This Sites contains links and references to other websites administered by unaffiliated third parties. This Privacy And Cookies Policy does not apply to such third party Sites. When you click a link to visit a third party websites, you will be subject to that websites' privacy practices. We encourage you to familiarize yourself with the privacy and security practices of the linked third party websites before providing any Personal Data on that websites.

*(vii) How does the Company handle employee and contractor privacy issues?*

Personal Data about our employees and contractors are addressed through internal Company policies and procedures, and are outside the scope of this Privacy and Cookies Policy.

*(viii) How will we handle any changes to this Privacy And Cookies Policy?*

We may update this Privacy And Cookies Policy from time to time as our services and privacy practices change, or as required by law. The effective date of our Privacy And Cookies Policy is posted below, and we encourage you to visit our Sites periodically to stay informed about our privacy practices. We will post the updated version of the Privacy And Cookies Policy on our Sites, and ask for your consent to the changes if legally required.

### **Contact Us**

If you have questions or comments regarding this Privacy And Cookies Policy or our privacy practices, please contact us at [privacy@sarclad.com](mailto:privacy@sarclad.com). You may also have a right to lodge a complaint with a supervisory authority.

Effective Date: May 25, 2018