

## APPLICABLE LEGISLATION REGARDING PRIVACY AND DATA PROTECTION

ALTRA CORPORATION is aware of the importance of guaranteeing Users' rights to privacy and data protection, and in this regard, and in compliance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council, of April 27, 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), as well as in compliance with applicable national regulations regarding data protection, information about the following points related to the processing of personal data through this website can be found below.

## IDENTIFICATION OF THE DATA CONTROLLER

We inform you that the personal data provided by the Client will be processed by ALTRA CORPORATION, with registered office at Calle Marie Curie No. 21, CP 29590 Campanillas, Malaga, Spain, with Tax Identification Number (NIF): B92611102; email: [customers@airzonecontrol.com](mailto:customers@airzonecontrol.com); and Telephone: +34 900400445.

## THE PURPOSE OF INFORMATION PROCESSING

**The data collected in the User registration process** will be processed for the following purposes:

- Profile management
- Access to your purchase history, as well as the status of your orders
- Manage warranties and returns
- If applicable, access to AirTools and Airzone Cloud

**The data collected in the online purchase process** will be processed with the aim of managing the delivery of the products purchased, managing the process of invoicing and providing customer service to the Client.

**In cases in which the person concerned has given his/her unequivocal consent to receive commercial communications**, his/her data will be used for sending informative communications about our products and services. This information may be sent by post, telephone and/or email, and may involve sending personalized information. You should bear in mind that this data processing involves the analysis of your user or client profile to determine what your preferences are and therefore which products and services may be most suited to your browsing and shopping habits when sending information. For example, based on your purchase and browsing history, we may customize our suggestions about products and services that we believe may be of interest to you.

**We use information about the User's habits and preferences** to conduct market research for business process optimization, demand-driven design of our services and products, and to display personalized content. We analyze the usability of the website to improve the content and services offered in these environments. To this end, we analyze the behavior of

Users for statistical and analytical purposes, in order to understand the way in which they interact with our website and thus introduce improvements.

**The information collected via the contact form** will only be used in order to respond to the query or request for information sent by the User.

## NATURE OF THE DATA PROCESSED

- **User registration and online purchase process:** The information collected is limited to identifying data, contact data, commercial activity data, invoicing data and data related to the products purchased through this online purchase process.
- **Sending personalized commercial communications and profile analysis:** The information collected is limited to identifying data and contact data (postal/electronic address). Aggregated, pseudonymized or anonymized data are used, as well as automatic learning algorithms, which allow us to make estimates, forecasts and analyses about the interests of our users.
- **Contact form:** Identifying and contact data are collected.

## DATA RECIPIENTS

The personal data collected shall be given to the transport company responsible for managing the delivery of the orders. We also inform you that, in cases in which the process of sale and delivery of the product involves the processing of data, this does not imply the international transfer of data, and we will only work with suppliers who offer adequate guarantees, in accordance with the provisions of Article 46 of the General Regulation on Data Protection.

In the event that the Client acquires an Aidoo product, this product requires for its use the download of the mobile application "Aidoo" managed by Airzone Clima S.L. As a preliminary step to the use of the Aidoo mobile application, the Client will be informed about the identity of the new Data Controller, as well as about the purpose of the processing, the period of retention of the information, the lawful basis for the processing, and the procedure enabled for the exercise of rights. ALTRA CORPORATION will not transfer personal data to Airzone Clima S.L., and the interested party must provide their personal data during the registration process for the Aidoo mobile application managed by Airzone Clima S.L.

## VERACITY OF THE INFORMATION PROVIDED

All information provided by the Client must be truthful and accurate. To this end, the Client guarantees the authenticity of all data provided through filling out the corresponding forms. Similarly, it is the Client's responsibility to keep all information provided to ALTRA CORPORATION up to date, so that it always corresponds to reality. In any case, the Client shall be solely responsible for any false or inaccurate statements he/she makes, and any damage caused to ALTRA CORPORATION or third parties due to the information provided.

## LAWFUL BASIS FOR PROCESSING DATA

- **Data processed as a registered user and for the online purchasing process:** The lawful basis for processing data is the execution of the contractual relationship between the parties, under the terms laid down in article 6.1.b) of the GDPR.
- **Data related to sending commercial communications:** In this case, the lawful basis for processing data is the unequivocal consent and acceptance given by the User, under the terms laid down in article 6.1.a) of the GDPR. The User has the right to withdraw consent at any time, but this will not affect the legality of data processing based on consent prior to its withdrawal.
- **Data related to the analysis of profiles and preferences of Users:** The lawful basis for processing data is the legitimate interest of ALTRA CORPORATION in the improvement of internal processes that result in the optimization of services and products to Users, within the framework of the provisions of Article 6.1.f) of the GDPR.
- **Data collected via the contact form:** The lawful basis for processing data is the unequivocal consent and acceptance given by the User, under the terms laid down in article 6.1.a) of the GDPR. The User has the right to withdraw consent at any time, but this will not affect the legality of data processing based on consent prior to its withdrawal.

## DATA RETENTION

**The information provided in the registration process** will be retained indefinitely unless the User requests his/her data be deleted from our User register, in which case we will proceed to immediately remove the information related to that User.

**The information related to the online sales process** will be retained during the term required to manage the delivery and invoicing of the acquired products; subsequently the information will be retained in blocked format during the term of prescription of legal actions, and will be eliminated once this period has passed.

**In cases in which the User had expressed his or her unequivocal consent for receiving commercial communications, as well as in relation to the processing of data from the analysis of user profiles and preferences,** the data will be retained indefinitely, unless the interested party manifests his or her opposition to processing, in which case the data will be immediately eliminated.

**The data collected via the contact form** will be kept for the period of time necessary to respond to the query or request for information sent by the User. Subsequently, the data will be retained in an appropriate blocked format during the term of prescription of legal actions, and will be eliminated once this period has passed.

## EXERCISE OF RIGHTS

The GDPR recognizes the different rights of the data subject in relation to the processing of their personal data. Below, we inform you about each of these rights and indicate the channels through which you can address, where appropriate, the corresponding request:

**Right of access:** You have the right to obtain confirmation from ALTRA CORPORATION as to whether or not personal data concerning you are being processed, as well as access to the following information: the purposes of the processing; the categories of data being processed; the recipients or categories of recipients to whom they have been or will be communicated; if possible, the planned period of storage of the personal data or, if this is not possible, the criteria used to determine this period.

**Right of rectification:** You have the right to obtain from ALTRA CORPORATION the rectification of inaccurate personal data concerning you. Furthermore, taking into account the purposes of processing, you have the right to have incomplete personal data supplemented, including by means of an additional declaration. To this end, you must indicate in your request what data you are referring to and the correction to be made; you must also attach, where necessary, documentation justifying the inaccuracy or incompleteness of the data subject to processing.

**Right of suppression:** You have the right to obtain from ALTRA CORPORATION the suppression of the personal data concerning you when one of the following circumstances occurs:

- They are not necessary in relation to the purposes for which they were collected or processed;
- You withdraw your consent, provided that the processing is not based on another legal basis;
- You oppose the processing and other legitimate reasons for the processing do not prevail; that the data have been treated unlawfully.

**Right of limitation:** You will have the right to obtain from ALTRA CORPORATION the limitation of the processing of the data when any of the following conditions is fulfilled:

- When you have challenged the accuracy of your personal data, during the period that ALTRA CORPORATION allows for the verification of their accuracy;
- In the event that you consider that the processing is unlawful and ALTRA CORPORATION has opposed the deletion of personal data and requests instead the limitation of their use;

- When ALTRA CORPORATION no longer needs the personal data for the purposes of processing, but the User needs them for the formulation, exercise or defense of claims;
- In the event that the User has opposed the processing, while verifying whether ALTRA CORPORATION's legitimate motives prevail over the Client's.

**Right of portability:** You shall have the right to receive the personal data concerning you that you have provided to ALTRA CORPORATION, in a structured format, of common use and subject to mechanical reading, and to transmit them to another data controller without being prevented by ALTRA CORPORATION, when the processing is based on consent, and is carried out by automated means. When exercising your right to data portability, you have the right to have your personal data transmitted directly from one data controller to another when technically possible. This right to portability shall not apply to the processing necessary for the performance of a mission carried out in the public interest or in the exercise of public powers conferred on ALTRA CORPORATION. The right to portability shall not extend to data that ALTRA CORPORATION has inferred from data directly derived from ALTRA CORPORATION's use of the services provided.

**Right to opposition:** You have the right to oppose the processing of data concerning you, at any time, including in the preparation of profiles. If you exercise this right, ALTRA CORPORATION will cease to process your personal data, unless we can prove that there are compelling legitimate reasons for the processing that prevail over your interests, rights and freedoms, or for the formulation, exercise or defense of claims.

Channels exist for the effective exercise of these rights: To exercise any of the rights indicated in the previous sections, the User may send an email to [rgpd@airzonecontrol.com](mailto:rgpd@airzonecontrol.com) or a letter addressed to the following address: Address: Calle Marie Curie, No. 21, CP 29590 Campanillas, Malaga, Spain.

In cases in which the User considers that during the processing of data by ALTRA CORPORATION his/her data protection rights have been infringed, and especially when the User has not been able to exercise his/her rights, the User may submit a complaint to the Agencia Española de Protección de Datos (Spanish Data Protection Agency) ([www.aepd.es](http://www.aepd.es)) or to another competent data protection controlling authority.

## **SOCIAL NETWORKS**

ALTRA CORPORATION has a profile on some of the main online social networks and is responsible for the content published. In no case will ALTRA CORPORATION extract data from social networks, unless it obtains the User's consent to do this expressly and as a one-off.

## **CHANGES TO THIS PRIVACY POLICY**

ALTRA CORPORATION reserves the right to modify this Privacy Policy should any changes arise regarding legislation, jurisprudence or industry practices. In such cases, ALTRA CORPORATION will announce the changes introduced with reasonable notice before their implementation on this page.

Date of the last update: September 19, 2019