

Wilo Intec SAS Privacy Policy

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A. Name and address of data controller

For the purposes of the General Data Protection Regulation (hereinafter referred to as "GDPR") and other national data protection laws in Member States and other applicable data protection provisions, the data controller is:

Wilo Intec

50 avenue Eugène Casella

18700 Aubigny-sur-Nère

T: +33 (0)2 48 81 62 62

Email: oem@wilo.com

Website: www.wilo-oem.com

Wilo Group has numerous legal entities in France and has decided to appoint a shared Data Protection Officer. This Officer is registered with the CNIL.

For all data protection information, please contact:

Wilo Intec SAS Data Protection Officer

C/o Wilo France

80 boulevard de l'industrie

53000 Laval

France

Email: data-privacy.fr@wilo.com

B. General information on data processing

1. Scope of personal data processing

We only collect and use our users' personal data to the extent necessary to provide a website, content and functions. We only collect and use our users' personal data once we have obtained their consent. An exception applies in the event that the user's consent cannot be obtained for factual reasons and that data processing is authorised by law (an example in France: the Human Resources department is permitted to process a person's social security number, information that is sent to the government, for tax deducted at source, for instance).

2. Legal basis for personal data processing

Article 6(1) letter (a) of the GDPR serves as the legal basis if we obtain the consent of the data subject whose personal data is being processed.

Article 6(1) letter (b) of the GDPR serves as the legal basis if the personal data processing is necessary for the performance of a contract to which the data subject is party. The same applies to processing required in order to take steps prior to entering a contract.

Article 6(1) letter (c) of the GDPR serves as the legal basis if the personal data processing is necessary to comply with legal obligations to which our company is subject.

Article 6(1) letter (d) of the GDPR serves as the legal basis when the personal data processing is necessary to safeguard the vital interests of the data subject or another natural person.

Article 6(1) letter (f) of the GDPR serves as the legal basis if the personal data processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by

the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

In France, as our company is in BtoB, the lawfulness of processing for direct marketing is the legitimate interest. Marketing is considered a legitimate interest of the company. This is why, unlike in other countries, we are not obliged to obtain the consent of our customers to invite them to a customer event or to contact them for direct marketing purposes, providing that our offering concerns similar goods which may interest them. We therefore operate on the principle of providing prior information and the right to object.

3. Deletion of data and retention period

The data subject's personal data is deleted or blocked once the purpose of processing has been achieved. Retention for a longer period is possible if this is set out by the European or national legislature in regulations of the European Union, laws or other provisions governing the data controller. Data is also deleted at the end of the legal retention period, unless their retention is required to establish or execute a contract. The data we keep includes:

- Log files, for a maximum of 14 days
- Databases for logins, for the duration of the account's existence
- Universal Messenger data, for a period of three months
- Commertools data, for the duration of the legal translation and associated legal retention periods

C. Operation of the web site and creation of log files

1. Description and scope of data processing

Our system automatically collects data and information from the computer a user uses to access our website each time they visit.

The data collected is as follows:

- (1) Information on the browser type and version used
- (2) User's operating system
- (3) User's Internet service provider
- (4) User's IP address
- (5) Date and time of access
- (6) Websites the user accessed our site from

- (7) Websites accessible to the user's system via our website
- (8) Duration of the user's visit
- (9) User's country of origin
- (10) User's preferred language
- (11) Dates and times of the user's first and most recent visit

This data is also recorded in our system's log files. However, we do not store it with other personal data pertaining to the user.

2. Legal basis for data processing

The legal basis for the temporary retention of data and log files is Article 6(1), letter (f) of the GDPR.

3. Purpose of data processing

The temporary storage of the IP address by our system is required to transmit the content of the site to the user's computer. This IP address must therefore be stored for the duration of the session.

The purpose of data retention in log files is to guarantee the smooth operation of our website. The data is also used to optimise the website and ensure the security of our IT systems.

These purposes are in line with our legitimate interest in processing this data according to Article 6(1) letter (f) of the GDPR.

4. Retention period

Data is deleted once the purpose of its collection has been achieved. When this purpose is ensuring the operation of the website, this is achieved at the end of the session.

For data kept in log files, it is achieved after a maximum of 14 days have passed. Data may be kept for longer in certain circumstances. Should this occur, the user's IP addresses are deleted or truncated in such a way that it is no longer possible to trace them back to the user.

5. Right to object and to contest a decision

The collection of data for the provision of the website and the storage of data in log files is absolutely crucial for the operation of the website. This means that users cannot oppose the collection and storage of data.

D. Use of cookies

1. Description and scope of data processing

Our website uses cookies. Cookies are text files stored in or by the Internet browser on the user's computer. When a user visits a website, cookies may be placed locally on their device. This cookie contains a string of characters which corresponds to a unique browser identification code which will be recognised on the next visit to the website.

We use cookies to make our website more user-friendly. Some features of our website require the browser accessing it to be identified once the user has left our page.

The cookies store and send the following data:

- (1) Products in a shopping basket
- (2) Information on the connection
- (3) Information on conversations (Chat)
- (4) Security mechanisms for forms (XSRF)
- (5) Wish list products
- (6) Google Analytics services
- (7) General verification of Facebook Pixel
- (8) Google Maps integration
- (9) Universal Messenger data for a website experience based on a target group
- (10) YouTube clip integration

Our website also uses cookies enabling analysis of the user's browsing and use of the website.

The following data may be transferred:

- (1) Search terms entered
- (2) Pages viewed
- (3) Use of website functions

The user data collected is pseudonymised using technical methods. It can no longer be traced to the user. The data is not combined with the user's other personal data.

When they access the website, users are informed of the use of cookies for analytics purposes by an information banner which also directs them to this

Privacy Policy. This includes information on how to prevent the installation of cookies by adjusting browser settings.

2. Legal basis for data processing

The legal basis for data processing involving the use of cookies is Article 6(1), letter (f) of the GDPR.

3. Purpose of data processing

The use of cookies which are strictly necessary is aimed at making the site more user-friendly. It may not be possible to access some functions of our website if cookies are deactivated. These functions need to recognise the browser once it has left the website.

The following applications require the use of cookies:

- (1) Purchasing functions (basket, for instance)
- (2) Tracking functions (country of origin, for instance)

The user data collected by cookies which are strictly necessary are not used to generate user profiles.

Analytics cookies are used exclusively to improve the quality of our website and its content. The analytics cookies provide us with information on how the website is used and how we can continue to improve our services.

These aims are in line with our legitimate interest in processing this data in accordance with Article 6(1) letter (f) of the GDPR.

4. Retention period, right to object and to contest a decision

The user's computer stores and sends the cookies to our website. This means our users have full control over the use of cookies. You can deactivate or restrict the transmission of cookies by adjusting your Internet browser settings. Cookies which have already been placed on a user's computer can be deleted at any time. You can also do this automatically. If cookies are deactivated, you may no longer be able to use all the functions of our site.

E. Website contact form

1. Description and scope of data processing

Our website includes a contact form you can use to send us a message online.
<https://wilo.com/oem/en/Contact/>

The data entered in the contact form is as follows:

- (1) First name*
- (2) Last name*
- (3) Company
- (4) E-Mail*
- (5) Zip
- (6) City
- (7) Country*
- (8) Your message*

The contact form ends with an information section (containing a URL link to the Privacy Policy) and an action button reading "Send".

The data entered is not stored on a server.

In this context, it will not be shared with third parties. It is exclusively kept for the purposes of processing correspondence, unless we use subcontractors or other subsidiaries of the Wilo Group to perform our services. For example, if the contact form is used by an end user who is an Italian fitter, and he requires technical information, his request will be transferred to our subsidiary in Italy so his request can be processed by our internal departments who are responsible for this issue.

2. Legal basis for data processing

The legal basis for processing data submitted by the user using the contact form is Article 6(1) letter (a) of the GDPR.

The legal basis for processing data sent in an email is Article 6(1) letter (f) of the GDPR. If the aim of the contact email is to establish a contract, for instance placing an order with customer service, data processing is also based on Article 6(1) letters (b) and (c) of the GDPR.

The legal basis for storing information on course participants is Article 6(1) letter (f) of the GDPR.

3. Purpose of data processing

We process only the personal data submitted in an online form designed for processing user requests. In the event that you contact us via email, this encompasses the legitimate interest required for data processing. If you sign up to a training session, the personal data you submit will be used to deliver and organise training sessions.

All other personal data processed during the submission process is aimed at preventing misuse of the contact form and safeguarding the security of our IT systems.

4. Retention period

Data is deleted once the purpose of its collection has been achieved. Personal data entered in the online form is stored on our servers in Germany.

5. Right to object and to contest a decision

The user may revoke their consent to the processing of their personal data at any time. Users who contact us by email may withdraw their consent to the storage of their personal data at any time. If this consent is revoked, correspondence with the user is brought to an end.

In that case, all personal data stored during the course of contact is deleted.

F. Website analysis services

1. Description and scope of data processing

This website uses Google Analytics, a website analysis service from Google Inc. (hereinafter referred to as "Google"). Google Analytics uses cookies, i.e. text files stored on your computer which enable analysis of how you use the site. The information generated by the cookies is usually transmitted to a Google server in the United States, where it is stored.

We would like to note that this website uses Google Analytics with the "_anonymizeIp()" extension, which means that only truncated IP addresses are processed in order to avoid establishing a direct link to individuals. Your IP address will be truncated by Google within the Member States of the European Union or other states signatory to the Agreement on the European Economic Area. The full IP address is only sent to the Google server in the US, where it is only truncated in certain exceptional cases.

2. Legal basis for data processing

The legal basis for the processing of personal data using Google Analytics is Article 6(1) letter (f) of the GDPR.

3. Purpose of data processing

The processing of data is aimed at sustainably improving the website and user experience as much as possible. Google uses this information on behalf of the

operator of this site to evaluate your use of it, to compile reports on associated activities and to supply other services to the site operator linked to its use and the Internet. For this purpose, our company concluded a data processing agreement with Google under Article 28 of the GDPR.

4. Retention period

Data is deleted once the purpose of its collection has been achieved.

5. Right to object and to contest a decision

The IP address sent by your browser as part of the Google Analytics service is not combined with other Google data. You can adjust your browser settings so that cookies are not stored on your computer. If you do so, please note that you may not be able to use all the functions offered by the site. You can also prevent Google from collecting specific data on the site (for example your IP address) generated by the cookies and prevent Google from processing this data by downloading and installing the browser extension available at the following link: <https://tools.google.com/dlpage/>

G. Rights of the data subject

If your personal data is processed, you are a "data subject" under GDPR. You therefore have the following rights vis-à-vis the data controller:

1. Access to information

You have the right to ask the data controller how we process your personal data.

If need be, you may ask the data controller to provide you with the following information:

- (1) The purposes of processing your personal data;
- (2) The categories of personal data being processed;
- (3) The recipients or categories of recipient to whom the personal data has been or will be disclosed;
- (4) The envisaged period for which the personal data will be stored, or, if there is no precise information on this subject, the criteria used to determine that period;
- (5) The existence of the rights to erasure or rectification, to restriction of processing of data by the data controller and the right to withdraw consent when processing is based on consent;
- (6) The right to lodge a complaint with a supervisory authority;

(7) In the event of indirect collection (where the personal data is not collected directly from the data subject), the right to know the source of the data concerning you;

(8) The existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, in that case, any relevant information about the logic involved, as well as the consequences for the data subject.

You are also entitled to request information on the transmission or non-transmission of your personal data to a third country or international organisation. In this respect, you may ask to be informed of adequate protection under Article 46 of the GDPR pertaining to this transmission.

2. Right to rectification

You have the right to ask the data controller to correct or complete your personal data if it is incorrect or incomplete. The data controller must correct the data without undue delay.

3. Right to restriction of processing

You have the right to request the restriction of processing of your personal data, subject to the following conditions:

- (1) You contest the accuracy of your personal data and give the data controller enough time to verify the accuracy of the data;
- (2) The processing is unlawful and you oppose the erasure of your personal data and request the restriction of its processing instead;
- (3) The data controller no longer needs the personal data for the purposes for which it was collected, but you need this data for the establishment, exercise or defence of legal claims; or
- (4) You have objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate interests of the data controller override yours.

If processing of your personal data has been restricted, the data – with the exception of storage – can only be processed with your consent, for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or legal entity, or for reasons of public interest of the European Union or one of its Member States.

If there are changes to the restriction imposed on data processing under the conditions stated, you shall be informed by the data controller before the restriction of processing is lifted.

4. Right to erasure

a) Duty to erase data

You may ask the data controller to erase your personal data immediately, and the data controller is obliged to erase it, without undue delay, providing one of the following conditions applies:

- (1) Your personal data is no longer necessary for the purposes for which it was collected or otherwise processed.
- (2) You withdraw your consent on which the data processing is based according to Article 6(1) letter (a) or 9(2) letter (a) of the GDPR, and where there are no other legal grounds for the data processing.
- (3) You object to data processing pursuant to Article 21(1) of the GDPR and there is no overriding legitimate interest in the processing, or you object to the data processing pursuant to Article 21(2) of the GDPR.
- (4) Your personal data has been unlawfully processed.
- (5) Your personal data must be erased for compliance with a legal obligation in European Union or Member State law to which the data controller is subject.
- (6) Your personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

b) Transmission of notification to third parties

If the data controller has made your personal data public and is obliged pursuant to Article 17(1) of the GDPR to erase the personal data, they must, taking account of available technology and the cost of implementation, take reasonable steps, including technical measures, to inform data controllers that are processing the personal data that you, as the data subject, have requested the erasure by such controllers of any links to, or copy or replication of, said personal data.

c) Exceptions

You do not have the right to have your data erased if its processing is necessary

- (1) For exercising the right to freedom of expression and information;
- (2) For compliance with a legal obligation which requires processing by European Union or Member State law to which the data controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- (3) For reasons of public interest in the area of public health in accordance with Article 9(2) letters (h) and (i) and Article 9(3) of the GDPR;
- (4) For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of the GDPR in so far as the right referred to in section a) is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

(5) For the establishment, exercise or defence of legal claims.

5. Right to transmission of notification

If you have exercised your right to modification or erasure of your data, or restriction of processing of your personal data vis-à-vis the data controller, the latter must notify all recipients to whom your personal data had been disclosed of this modification or erasure of your data or restriction of processing of your personal data, unless this proves impossible or would involve disproportionate effort or unreasonable expense.

You have the right to be informed of the recipients of your data by your data controller.

6. Right to data portability

You have the right to receive the personal data concerning you, provided to a data controller, in a structured, commonly used and machine-readable format. You also have the right to transmit this data to another data controller without hindrance from the data controller to which the personal data has been provided, where:

(1) Processing is based on consent in compliance with Article 6(1) letter (a) or 9(2) letter (a) of the GDPR, or on a contract pursuant to Article 6(1) letter (b) of the GDPR; and where

(2) The processing is carried out by automated means.

In exercising your right to data portability, you also have the right to have the personal data transmitted directly from one data controller to another, where technically feasible. This must not adversely affect the rights and freedoms of others.

The right to data portability shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

7. Right to object

You have the right to object at any time, on grounds relating to your particular situation, to processing of personal data concerning you which is based on Article 6(1) letter (e) or (f) of the GDPR. This right also applies to profiling, based on the same provisions.

The data controller shall no longer process the personal data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

Where personal data is processed for direct marketing purposes, you have the right to object to it at any time; this right also applies to profiling to the extent that it is related to such direct marketing.

If you object to processing for direct marketing purposes, your personal data shall no longer be processed for such purposes.

In the context of the use of information society services, and notwithstanding Directive 2002/58/EC, you may exercise your right to object by automated means using technical specifications.

8. Right to revoke consent given in the context of data protection law

You have the right to withdraw a declaration of consent previously given in the context of data protection law. This withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

9. Automated individual decisions, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or significantly affecting you. This right shall not apply if the decision

- (1) Is necessary for entering into, or for the performance of, a contract between you and a data controller;
- (2) Is authorised by European Union or Member State law to which the data controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or
- (3) Is based on the data subject's explicit consent.

However, decisions should not be based on the special categories of personal data referred to in Article 9(1) of the GDPR, unless Article 9(2) letter (a) or (g) applies and appropriate measures to safeguard the rights and freedoms and legitimate interests of the data subject are in place.

In the circumstances mentioned in points (1) and (3), the data controller must implement suitable measures to safeguard your rights and freedoms and legitimate interests, including at least the right to obtain human intervention from the data controller, to express your point of view and to challenge the decision.

10. Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data concerning you infringes this regulation.

The supervisory authority with which the complaint has been lodged must inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Article 78 of the GDPR.

If you wish to object to the collection, processing or use of your personal data by the company in line with this Privacy Policy, either categorically or for individual measures, you can send us your objection via email or letter to the following address:

Wilo Intec SAS Data Protection Officer

C/o Wilo Salmson France

80 boulevard de l'industrie

53000 Laval

France

Email: data-privacy.fr@wilo.com

H. Translation

This Privacy Policy is specific to Wilo Intec as there are certain specific local characteristics and functions. This policy has therefore been adapted from the Group policy, available at www.wilo.com (under "Privacy policy").

In order to provide comprehensible information and fulfil our obligation for transparency (Articles 12, 13 and 14 of the GDPR), this Privacy Policy is available in multiple languages: English and French.

I. Updates to this Privacy Policy

This Privacy Policy may be updated at any time on the basis of Wilo Intec's requirements or if necessary, by law.

Last amended: 30/06/2020