

# Privacy Statement

Effective Date: 2/15/2021

We appreciate your interest in our company. thyssenkrupp Access Corp. takes data protection very seriously. When you access and use this website, thyssenkrupp Access Corp. collects personal information (sometimes referred to in this privacy statement as personal data), and we may collect other information, from and about you. This includes data that you provide voluntarily and information collected automatically through use of the website. By means of this privacy statement, our company wishes to inform the public of the type, scope and purposes of the personal data) which is gathered, used and processed by us when you access and use this website, and how personal data is shared with other parties. Furthermore, affected persons are being informed of their rights by means of this privacy statement.

We may modify this privacy statement at any time and from time to time. We will notify users of any changes by, at a minimum, posting the updated privacy statement here. You should review this privacy statement every time you visit the website. Your continued use of the website or provision of personal data after any modifications to this privacy statements constitutes your acceptance of such changes.

This privacy statement only governs this website; other websites operated by us or our parent or affiliates may post a different privacy statement. Please be advised that this website is intended only for users in the United States. If you are located outside of the United States, please be aware that information we collect may be maintained on servers in or outside the United States. Your information may be subject to applicable foreign laws. The data protection laws in the United States may differ from those of the country in which you are located. By using this website or providing us with any information, you consent to the transfer to, and processing, usage, sharing and storage of your information as set forth in this privacy statement.

thyssenkrupp Access Corp. has implemented technical and organizational security measures to protect personal data. However, due to the nature of the Internet based, absolute protection cannot be guaranteed. For this reason, all affected persons are free to provide us with personal data by calling us at 800-285-9862 between 9am and 5pm Eastern.

## **1. Definitions**

Our data protection declaration is intended to be readable and understandable both for our customers and for our business partners. In order to ensure this, we wish to firstly explain the terms which have been used.

We use the following terms in this privacy statement amongst others:

a) personal data

Personal data is all information which relates to an identified or identifiable natural person (hereinafter "affected person"). A natural person is considered identifiable if he or she can be identified directly or indirectly, in particular by means of allocation to an identifier such as a name, reference number, location data, online profile, or one or more special characteristics, such as the expression of the physical, physiological, genetics, psychic, economic, cultural or social identity of this natural person.

b) affected person

An affected person is any identified or identifiable natural person whose personal data is processed by the body responsible for the processing.

c) processing

Processing is any process which takes place with or without the assistance of automated procedures or any such process order in connection with personal data, such as gathering, recording, organization, filing, saving, adjustment or alteration, reading, retrieval, use, disclosure by means of transfer, distribution or other form of provision, comparison or connection, restriction, deletion or destruction.

d) processing restriction

Processing restriction is the marking of saved personal data with the purpose of restricting its processing in the future.

e) pseudonymization

Pseudonymization is the processing of personal data in such a way where personal data can no longer be assigned to a specific affected person without consulting additional information, should this additional information be stored separately and be subject to technical and organizational measures which ensure that the personal data cannot be assigned to an identified or identifiable natural person.

f) responsible body or body responsible for the processing

The responsible body or the body responsible for the processing is the natural or legal person, authority, institution or other body which takes a decision alone or together with others concerning the purposes and means of the processing of personal data.

g) service provider

A service provider is a natural or legal person, authority, institution or other body which processes personal data on behalf of the responsible body.

h) recipient

a recipient is a natural or legal person, authority, institution or other body to whom personal data is disclosed, regardless of whether this is a third party or not. Authorities which may receive personal data in the course of a specific investigation order under applicable laws are not considered to be recipients.

i) third party

A third party is a natural or legal person, authority, institution or other body apart from the affected person, the responsible body, the order processor and the persons who are authorized under the direct competence of the responsible body or order processor to process the personal data.

## **2. Name of the body responsible for the processing**

The responsible body under applicable data protection laws is thyssenkrupp Access Corp.

## **3. Recipients**

The information we collect from or about you may be disclosed to other parties, as described below.

Service Providers. We may use external service providers to help us provide and maintain the website and our services. At thyssenkrupp Access Corp. and within the thyssenkrupp family of companies, only those service providers which require access to data in order to provide the services of thyssenkrupp Access Corp. or manage the company's operations have this entitlement. Our service providers are contractually obliged to comply with the requirements under data protection laws and to maintain confidentiality.

Data of interested persons, customers and users will be passed on to other service providers who support thyssenkrupp Access Corp., for example in the following categories:

- Fulfill your requests
- Installation and service
- IT and website development and hosting services
- Logistics
- Printing services
- Archiving

- Post and telecommunications, consultancy, legal advice, auditing and assistance
- Compliance and data protection
- Communications and customer service
- Data analytics

Business Changes. If we become involved in a proposed or actual merger, acquisition, sale of assets, joint venture, securities offering, bankruptcy, reorganization, liquidation, dissolution, or other transaction or if the ownership of all or substantially all of our business otherwise changes, we may share or transfer your information to a third party or parties in connection therewith.

Other TK Entities. We may also share your information with our parent company and other TK entities that perform certain functions on our behalf, such as for internal audit, management, legal, security, compliance, billing and administrative purposes.

Other Disclosures. Regardless of the choices you make regarding your information (as described below), we may disclose information about you to third parties to:

- Enforce or apply the website Terms and Conditions;
- Respond to subpoenas, warrants, or court orders, or in connection with any legal process, or to cooperate with government or law enforcement officials or private parties to the extent required or permitted by law;
- Protect our rights, reputation, safety and property, or that of our users or others (for example, protecting the security of the Site);
- Protect against potential liability;
- Establish or exercise our rights to defend against legal claims; or
- Investigate, prevent, or take action regarding suspected illegal activities, suspected fraud, the rights, reputation, safety or property of us, users or others, violation of the Terms and Conditions, our policies or agreements or as otherwise permitted or required by law.

Aggregated Information. We may share aggregated and/or de-identified information relating to visitors to and users of the Services with affiliated or unaffiliated parties.

#### **4. Cookies and Similar Technologies**

This website uses cookies and similar technologies. Cookies are text files which are deposited on a computer system and saved by an Internet browser.

Numerous websites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a clear identifier of the cookie. It is formed of a letter sequence, by means of which websites and servers can be assigned to the concrete Internet browser in which the cookie was saved. This enables the websites and servers which are being visited to differentiate between the individual browser of the affected person and other

Internet browsers which contain different cookies. A specific Internet browser can be recognized again and identified via the clear cookie ID.

By means of the use of cookies, thyssenkrupp Access Corp. can provide the users of this website with services which are more user friendly and which would not be possible without the setting of cookies.

By means of a cookie, the information and offers on our website can be optimized for the user. As previously explained, cookies enable us to recognize the users of our website again. The purpose of this recognition is to make the use of our website easier for our users. The user of a website which uses cookies is not for example required to enter his or her login data again each time he or she visits the website, as this is carried out by the website and the cookie saved on the computer system of the user. A further example is the cookie of a shopping basket in an online shop. The online shop records the items which a customer has placed in the virtual shopping basket via a cookie.

Cookies are both browser-specific and device-specific. You can prevent the setting of cookies via our website at any time by setting your Internet browser. In addition, cookies which have already been set can be deleted at any time via an Internet browser or other software programs. This is possible in all current Internet browsers. Should the affected person de-activate the setting of cookies in the used Internet browser, in certain cases not all functions of our website will be fully usable. For information on the cookies we may use at this site, please review our [Cookie Notice](#) posted on the home page.

## **5. Automatically collected data**

This website automatically records a list of general data and information each time the website is visited by an affected person or an automated system. This general data and information is saved in the logfiles of the server. The following can be recorded:

(1) the browser types used and the versions, (2) the operating system used by the accessing system, (3) the website from which an accessing system retrieves our website (so-called referrer), (4) the sub websites which are managed by an accessing system on our website, (5) the date and time of access to the website, (6) IP address, (7) the Internet service provider of the accessing system and (8) other similar data and information which serves the purpose of defending against risks in case of attacks against our IT systems.

This information is required in order to:

(1) correctly deliver the content of our website, (2) optimize the content of our website, (3) manage and optimize advertising for this website, (4) ensure the continued functionality of our IT systems and the technology of our website and (5) provide prosecution authorities with the necessary information for criminal proceedings involving the website (including, without limitation, in the event of a cyber attack). This data, which is used by thyssenkrupp Access Corp. to improve our services and enhance data protection and data security. The data of the server logfiles is saved separately from all personal data provided by an affected person.

## 6. Personal data you provide and how we use it

In general, when you use the website we collect personal data, and we may collect other information that you voluntarily provide. The information collected may include:

**Personal Contact Information**, such as your first and last name, postal address, email address, and telephone number.

**Other Information** you provide to us when you use the website and features or contact us, such as information about your home elevator space and gap size, and your comments or questions.

We use the information we collect to provide the website and administer our business, including to:

- Facilitate and improve our provision and your use of the website and our services;
- Provide you with products and services you request;
- Respond to your inquiries;
- Communicate with you;
- Create deidentified data and compile aggregate data;
- Perform website analytics;
- Allow us to personalize and enhance your experience using the website;
- Prevent misuse of the Site, maintain system security, protect our rights or the rights or property of others, and otherwise protect our users and our business;

We also use the information we collect as permitted or required by law. We may combine the information we collect from or about you and use it in the manner described in this privacy statement.

**7. Data Retention** We retain information as long as necessary to fulfill your requests and operate our business. We will retain information related to your request for space guards permanently.

## 8. California Privacy Rights

If you are a California resident, the California Consumer Privacy Act of 2018 (“CCPA”) provides you with certain rights with respect to your personal information.

- **Right to Access.** You have a right to request that we disclose, no more than twice in a 12-month period:
  - The categories and specific pieces of personal information we have collected about you.
  - The categories and sources from which personal information is collected.

- The business or commercial purposes for collecting or selling personal information.
- The categories of third parties with whom we share personal information.

The categories and specific pieces of personal information we collect, sources from which personal information is collected, and purposes for collecting personal information are described in Section 7 of this privacy statement, and the categories of third parties with whom we share personal information are described in Section 4. We will provide this information upon receipt of a verifiable consumer request. How we will verify your identity depends on how you have interacted with us in the past. To exercise this right, you can contact us by phone at 800-285-9862 between 9am and 5pm Eastern or emailing us at [info@homelevator-safety.com](mailto:info@homelevator-safety.com).

- **Right to Delete.** You have a right to request that we delete any personal information about you that we have collected from you, subject to certain exceptions. If we are required to delete your personal information, then upon receipt of a verifiable request, we will delete your personal information from our records and direct any service providers to delete your personal information from their records. To exercise this right, you can contact us by phone at 800-285-9862 between 9am and 5pm Eastern or emailing us at [info@homelevator-safety.com](mailto:info@homelevator-safety.com). Note that we will retain information about your request for and installation of space guards permanently.
- **Right to Opt-Out.** We do not sell personal information, as that term is defined in the CCPA.

## 9. Nevada Privacy Rights

Nevada residents have a right to submit a verified request directing a website operator to not make any “sale” of covered information collected about a consumer for monetary consideration to a person for such person to license or sell the information to additional persons, subject to certain exceptions. When you use the website, we do not engage in the “sale” of covered information, as that term is defined.

## 10. Links to other websites

This privacy statement applies only to the website where this policy is posted. The Site may contain links to other websites to which this privacy statement does not apply. We do not control, and we are not responsible for, the privacy practices or content of other websites that do not post this privacy statement. You should review the privacy policies of any linked websites you visit.