

COMMERCIAL VEHICLE GROUP, INC.
PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY

1. OUR PRIVACY STATEMENT

The protection of your personal data is of great importance to **Commercial Vehicle Group, Inc.** (“**Company**”) and its affiliates within and outside the European Economic Area (the “**EEA**”) (together, the “**Company Group**”). This privacy policy (the “**Privacy Policy**”) therefore intends to inform you about how Company Group entities, acting as data controller, collects and processes your personal data that you submit or disclose to us. We also act as data controller when we process your personal data received or obtained through third-parties. We process this personal data in accordance with the applicable EU and Member State regulations on data protection in particular, the General Data Protection Regulation No 2016/679 (the “**GDPR**”).

We encourage you to read this Privacy Policy carefully. If you do not wish your personal data to be used by us as set out in this Privacy Policy, please do not provide us with your personal data, unless the provision of such personal data is required to carry out our business or employment relationship, or to comply with a legal obligation. If you do not provide us with your personal data in certain instances, we may not be able to engage you as a customer, supplier or employee; we may not be able to provide you with our services, you may not have access to and/or be able to use some features of the website, and your experience may be impacted.

If you have any queries or comments relating to this Privacy Policy, please contact GDPRcompliance@cvgrp.com.

2. HOW DO WE USE YOUR PERSONAL DATA?

We will always process your personal data based on one of the legal basis provided for in the GDPR (Articles 6 and 7). In addition, we will always process your sensitive personal data, for example, concerning your trade union membership, religious views, or health condition, in accordance with the special rules provided for in the GDPR (Articles 9 and 10).

We may collect and process your personal data for the purposes detailed below:

- (a) **To communicate effectively with you, manage our relationship as customer, supplier or partner, and to conduct our business** ► to conduct our business, including to respond to your queries, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us;

Use justification: legal obligations (Article 6(1)(c) GDPR), performance of contracts (Article 6(1)(b) GDPR), legitimate interests (Article 6(1)(f) GDPR; to enable us to perform our obligations and provide our services to you)

- (b) **To perform and manage our relationship with employees and other staff** ► to perform and manage our relationship with employees and other staff as their employer and contractor, and to fulfil all regulatory obligations related to our employment or contractual relationship;

Use justification: legitimate interests (Article 6(1)(f) GDPR; to enable us to perform our obligations and provide our services to you)

- (c) **To perform analytics and provide you with marketing materials** ► to perform analytics of our products and services and provide you with updates and offers, where you have chosen to receive these. We may also use your information for marketing our own and our selected business partners' products and services to you by post, email, SMS, phone and fax and, where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by contacting us through the "General Data Protection Enquiry" form below.

Use justification: consent (Article 6(1)(a) GDPR), legitimate interest (Article 6(1)(f) GDPR; to keep you updated with news in relation to our products and services)

- (d) **For research and development purposes** ► to analyse your personal information in order to better understand your and our other clients' services and marketing requirements, to better understand our business and develop our products and services;

Use justification: legitimate interests (Article 6(1)(f) GDPR; to allow us to improve our services)

- (e) **To monitor certain activities** ► to monitor queries and transactions to ensure service quality, compliance with procedures and to combat fraud;

Use justifications: legal obligations (Article 6(1)(c) GDPR), legal claims (Article 9(2)(f) GDPR), legitimate interests (Article 6(1)(f) GDPR; to ensure that the quality and legality of our services)

- (f) **To inform you of changes** ► to notify you about changes to our services and products;

Use justification: legitimate interests (Article 6(1)(f) GDPR; to notify you about changes to our service)

- (g) **To ensure website content is relevant** ► to ensure that content from our websites is presented in the most effective manner for you and for your device, which may include passing your data to business partners, suppliers and/or service providers;

Use justification: legitimate interests (Article 6(1)(f) GDPR; to allow us to provide you with the content and services on the websites)

- (h) **To reorganise or make changes to our business** ► in the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer

your personal information to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this policy

Use justification: legitimate interests (Article 6(1)(f) GDPR; in order to allow us to change our business)

- (i) **In connection with legal or regulatory obligations** ► We may process your personal information to comply with our regulatory requirements or dialogue with regulators as applicable which may include disclosing your personal information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.

Use justification: legal obligations (Article 6(1)(c) GDPR); , legal claims (Article 9(2)(f) GDPR), legitimate interests (Article 6(1)(f) GDPR; to cooperate with law enforcement and regulatory authorities)

Please be aware that, where we process your personal data based on your consent (Article 6(1)(a) or 9(2)(a) GDPR), you are entitled to withdraw your consent at any time, and this without affecting the lawfulness of processing based on your consent before withdrawal thereof.

On occasions, we may need to collect and process your personal data in order to perform the contract with you or to comply with a legal obligation (Articles 6(1)(b) and (c) GDPR). If you do not provide us with the personal data requested from you in these instances, we might be unable to comply with legal obligations to which we are subject or to proceed to fulfil our contract with you.

We will process your data for these specified, explicit and legitimate purposes, and will not further process the data in a way that is incompatible with these purposes. If we intend to process personal data originally collected for one purpose in order to attain other objectives or purposes, we will ensure that you are informed of this. We will keep your personal data for as long as it is necessary for us to comply with our

legal obligations, to ensure that we provide an adequate service, and to support its business activities (Article 5 and 25(2) GDPR).

3. WHAT TYPES OF PERSONAL DATA DO WE USE?

For the purposes specified under this Privacy Policy, we process the personal data obtain from you directly (when you decide to communicate such data to us, i.e., when you contact us, or when you fill in forms displayed on the Website) or indirectly (data provided to us by a third-party). We ensure that the personal data processed be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

4. HOW DO WE SHARE YOUR PERSONAL DATA?

We may share your personal data with Company Group entities and with third parties in accordance with the GDPR. Where we share your data with a data processor, we will put the appropriate legal framework in place in order to cover such transfer and processing (Articles 26, 28 and 29). Furthermore, where we share your data with any entity outside the EEA, we will put appropriate legal frameworks in place, notably controller-to-controller (2004/915/EC) and controller-to-processor (2010/87/EU) Standard Contract Clauses approved by the European Commission, in order to cover such transfers (Articles 44 ff. GDPR).

Strategic Partners

Subject to your prior consent, your personal data may be transferred to, stored, and further processed by strategic partners that work with us to provide our products and services or help us market to customers. Your personal data will only be shared by us with these companies in order to provide or improve our products and services.

Service Providers

We share your personal data with companies which provide services on our behalf, such as hosting, maintenance, support services, email services, marketing, auditing, fulfilling your orders, processing payments, data analytics, providing customer service, and conducting customer research and satisfaction surveys.

Corporate Affiliates and Corporate Business Transactions

We may share your personal data with all Company's affiliates. In the event of a merger, reorganization, acquisition, joint venture, assignment, spin-off, transfer, or sale or disposition of all or any portion of our business, including in connection with any bankruptcy or similar proceedings, we may transfer any and all personal data to the relevant third party.

Legal Compliance and Security

It may be necessary for us – by law, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence – to disclose your personal data. We may also disclose your personal data if we determine that, due to purposes of national security, law enforcement, or other issues of public importance, the disclosure is necessary or appropriate.

We may also disclose your personal data if we determine in good faith that disclosure is reasonably necessary to protect our rights and pursue available remedies, enforce our terms and conditions, investigate fraud, or protect our operations or users.

Data Transfers

Such disclosures may involve transferring your personal data out of the European Union to the United States. Such transfer may take place for employee or business management purposes by the Company. For each of these transfers, we make sure that we provide an adequate level of protection to the data transferred, in particular by entering into standard contract clauses as defined by the European Commission decisions 2001/497/EC, 2002/16/EC, 2004/915/EC and 2010/87/EU.

We will not use your personal data for online marketing purposes unless you have expressly consented to such use of your personal data. You can change your marketing preferences at any time by contacting us as detailed below.

5. OUR RECORDS OF DATA PROCESSES

We handle records of all processing of personal data in accordance with the obligations established by the GDPR (Article 30), both where we might act as a controller or as a processor. In these records, we reflect all the information necessary in order to comply with the GDPR and cooperate with the supervisory authorities as required (Article 31).

6. SECURITY MEASURES

We process your personal data in a manner that ensures their appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage. We use appropriate technical or organisational measures to achieve this level of protection (Article 25(1) and 32 GDPR).

We will retain your personal information for as long as it is necessary to fulfill the purposes outlined in this Privacy Statement, unless a longer retention period is required or permitted by law.

7. NOTIFICATION OF DATA BREACHES TO THE COMPETENT SUPERVISORY AUTHORITIES

In case of breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed, we have the mechanisms and policies in place in order to identify it and assess it promptly. Depending on the outcome of our assessment, we will make the requisite notifications to the supervisory authorities and communications to the affected data subjects, which might include you (Articles 33 and 34 GDPR).

8. PROCESSING LIKELY TO RESULT IN HIGH RISK TO YOUR RIGHTS AND FREEDOMS

We have mechanisms and policies in place in order to identify data processing activities that may result in high risk to your rights and freedoms (Article 35 of the GDPR). If any such data processing activity is identified, we will assess it internally and either stop it or ensure that the processing is compliant with the GDPR or that appropriate technical and organisational safeguards are in place in order to proceed with it.

In case of doubt, we will contact the competent Data Protection Supervisory Authority in order to obtain their advice and recommendations (Article 36 GDPR).

9. YOUR RIGHTS

You have the following rights regarding personal data collected and processed by us.

- Information regarding your data processing: You have the right to obtain from us all the requisite information regarding our data processing activities that concern you (Articles 13 and 14 GDPR).
- Access to personal data: You have the right to obtain from us confirmation as to whether or not personal data concerning you are being processed, and, where that is the case, access to the personal data and certain related information (Article 15 GDPR).
- Rectification or erasure of personal data: You have the right to obtain from us the rectification of inaccurate personal data concerning you without undue delay, and to complete any incomplete personal data (Article 15 GDPR). You may also have the right to obtain from us the erasure of personal data concerning you without undue delay, when certain legal conditions apply (Article 17 GDPR).
- Restriction on processing of personal data: You may have the right to obtain from us the restriction of processing of personal data, when certain legal conditions apply (Article 18 GDPR).

- Object to processing of personal data: You may have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you, when certain legal conditions apply (Article 21 GDPR).
- Data portability of personal data: You may have the right to receive your personal data in a structured, commonly used and machine-readable format, and have the right to transmit those data to another controller without our hindrance, when certain conditions apply (Article 20 GDPR).
- Not to be subject to automated decision-making: You may have the right not to be subject to automated decision-making (including profiling) based on the processing of your personal data, insofar as this produces legal or similar effects on you, when certain conditions apply (Article 22 GDPR).

If you intend to exercise such rights, please refer to the contact section below.

If you are not satisfied with the way in which we have proceeded with any request, or if you have any complaint regarding the way in which we process your personal data, you may lodge a complaint with a Data Protection Supervisory Authority.

10. CHILDREN

Our products and services are intended for adult customers. Thus, generally we do not knowingly collect and process information on children under fifteen (15). If we discover that we have collected and processed the personal data of a child under fifteen (15), or the equivalent minimum age depending on the concerned jurisdiction, we will take steps to delete the information as soon as possible. If you become aware that a child under fifteen (15) has provided us with personal data, please contact us immediately by using the contact address specified under this Privacy Policy.

11. UPDATES TO PRIVACY POLICY

We may revise or update this Privacy Policy from time to time. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy via the Services. If we make changes which we believe are significant, we will inform you through the Website to the extent possible and seek your consent where applicable.

CONTACT

For any questions or requests relating to this Privacy Policy, you can contact us at the following:

GDPRcompliance@cvgrp.com

Commercial Vehicle Group, Inc.

Attn: GDPR Compliance

7800 Walton Parkway
New Albany, OH 43054

U.S.A.

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