

Schindler Technology, Inc. is committed to protecting your privacy and states that this privacy policy conforms to the Safe Harbor Principles. This privacy policy sets forth the privacy principles that Schindler Technology, Inc. follows with respect to transfers of Personal Data (as defined below) from the fifteen (15) member states of the European Union (the "EU") (Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, Sweden and the United Kingdom) to the United States. You can visit most pages on our site without giving us any information about yourself. But sometimes we do need information to provide services that you request, and this privacy policy explains data collection and use in those situations. This privacy policy only applies to all Schindler Technology, Inc. activities, online or offline, Schindler Technology, Inc.'s web sites as well as any and all products or services. This privacy policy tells how we collect information and how we use it. Please read the complete Schindler Technology, Inc.'s privacy policy

As it pertains to the Safe Harbor Principles, Schindler Technology, Inc. collects data on behalf of Schindler Technology, Inc.'s clients. Such data includes contact information, such as job title, company, email address and country. Schindler Technology, Inc. also acts as a data processor with respect to the information it collects from its clients. Schindler Technology, Inc. also collects information from surveys completed through a link in Emails sent by Schindler Technology, Inc. Schindler Technology, Inc. will not transfer or disclose personal data to any third party, except as explicitly requested by Schindler Technology, Inc.'s clients and only for the purposes for which it was intended.

All data collected, processed and stored by Schindler Technology, Inc. either for its own purpose or on behalf of its clients, is protected by industry-standard measures to protect the integrity and confidentiality of the data, and to prevent the loss, misuse or alteration of this information. Security measures include Secure Sockets Layer ("SSL"), internet firewalls and physical and electronic access restrictions.

Schindler Technology, Inc. adheres to the following seven principles of privacy protection that are consistent with the Safe Harbor Principles regarding data:

## **1. NOTICE/AWARENESS**

At the time when Schindler Technology, Inc. first asks a person to provide any information of a personal nature, including, name, contact information and email address (hereinafter referred to as "Personal Data") or as soon thereafter as is practicable, but in any event before Schindler Technology, Inc. uses such Personal Data for a purpose other than the purpose(s) for which it was originally collected or discloses it for the first time to a third party, Schindler Technology, Inc. will inform such person in clear and conspicuous language of (a) the purpose(s) for which Schindler Technology, Inc. collects and uses such Personal Data, (b) how such person can contact Schindler Technology, Inc. with any inquiries or complaints about such Personal Data, (c) the types of third parties to whom Schindler Technology, Inc. discloses such Personal Data, and (d) the choices and means that Schindler Technology, Inc. offers such person for limiting the use and disclosure of such Personal Data.

## **2. CHOICE/CONSENT**

Schindler Technology, Inc. will offer a person the opportunity to choose (opt-out) whether such Personal Data is (a) to be disclosed to a third party, or (b) to be used for a purpose other than the purpose(s) for which it was originally collected or subsequently authorized by such person. Schindler Technology, Inc. will offer a person clear and conspicuous, readily available mechanisms to exercise such choice.

### **3. ONWARD/TRANSFER**

Schindler Technology, Inc. will disclose Personal Data to third parties pursuant to the Notice and Choice principles set forth above. In the event Schindler Technology, Inc. wants to transfer Personal Data to a third party that is acting as its agent, Schindler Technology, Inc. will, prior to such transfer, obtain assurances from such third party that it (a), it may do so if it makes sure that the third party subscribes to the safe harbor principles or (b) is subject to the Directive or (c) is subject to another “adequate level of protection” finding, or (d) the third party enter into a written agreement with Schindler Technology, Inc. requiring that the third party provide at least the same level of privacy protection as is required by the relevant Safe Harbor Principles.

### **4. ACCESS/PARTICIPATION**

You may access the data collected by Schindler Technology, Inc. about you by sending a request to the address listed below. If you believe that an error has been made in the accuracy of the data collected from you, Schindler Technology, Inc. will correct such error upon adequate verification of the error and the identity of the person seeking the correction.

If you wish to access, remove or correct any personally identifying data you have supplied to Schindler Technology, Inc. you may do so by:

1. Sending an e-mail request to [pschindler@schindlertech.com](mailto:pschindler@schindlertech.com)
2. Sending a letter via the U.S. Mail to:

Privacy Officer  
Schindler Technology, Inc.  
2434 Seminole Court  
Riverwoods, IL 60015

Please understand that in order to protect your privacy and security, we may also need to take reasonable steps to verify your identity before granting access or making corrections.

### **5. SECURITY**

Schindler Technology, Inc. takes reasonable precautions to protect Personal Data from loss, misuse and unauthorized access, disclosure, alteration and destruction.

### **6. INTEGRITY OF THE DATA COLLECTED**

Schindler Technology, Inc. will not process Personal Data in a manner other than the purpose(s) for which it: (a) has been collected, or (b) has been subsequently authorized by the person. Schindler Technology, Inc. will take reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

## **7. ENFORCEMENT/REDRESS**

If for some reason you believe that Schindler Technology, Inc. has not adhered to its privacy policy, please notify us by either of the methods set forth above. Schindler Technology, Inc. will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of Personal Data in accordance with the principles contained in this privacy policy. In the event that complaints cannot be resolved between Schindler Technology, Inc. and any complainant, Schindler Technology, Inc. will cooperate and participate in dispute resolution procedures of the panel established by the EU data protection authorities to resolve such disputes.

This privacy policy may be amended by Schindler Technology, Inc. from time to time, provided that such amendments are consistent with the requirements of the Safe Harbor Principles.