

## **THE TIMKEN COMPANY PRIVACY NOTICE QUALITY ISSUE MANAGEMENT SYSTEM**

The purpose of this Privacy Notice (“**Notice**”) is to inform you about how and why we use your personal information as part your use of our Quality Issue Management (“**QIM**”) system. This Notice applies to any individual (“**you**” “**your**”) who is employed by or otherwise acting on behalf of a vendor of good or services to The Timken Company or any of its global affiliates (“**we**”, “**us**”, or “**our**”) and is directed by the vendor to use the QIM to manage quality issues involving the vendor’s goods or services.

**IMPORTANT NOTE:** The vendor is directing you to use our QIM system and provide the personal information necessary for that use, so that, through you, the vendor can manage quality issues involving its goods or services. Timken does not require any individual to use the QIM or provide personal information, although you will not be able to open an account without providing the information.

Most of this Notice applies globally, but some portions apply only where specifically required by local law, for example, the General Data Protection Regulation 2016/679, a regulation of the European Union on data protection and privacy for all individuals within the European Union (“**EU**”) and the European Economic Area (“**EEA**”) (“**GDPR**”), and the California Consumer Privacy Act (“**CCPA**”). Those portions will be identified as only applying as required by law.

### **WHO COLLECTS THE INFORMATION?**

The controller for the personal data is The Timken Company and any of our global affiliates with which your employer conducts business. Contact details for The Timken Company are provided at the end of this Notice. A controller of personal data is responsible for deciding how they hold and use personal information about you and for notifying you of the information contained in this Notice.

### **WHAT INFORMATION DO WE COLLECT?**

You access the QIM through Timken’s Access Panel. To gain access to the Access Panel, you provide other information, which is described in the [Timken Access Panel Privacy Notice](#). As you use the QIM, information is collected automatically about when you log in and actions you take within the system, such as uploading documents and looking at or modifying pages or files.

### **WHY DO WE COLLECT YOUR PERSONAL DATA AND ON WHAT BASIS?**

We collect this information generally to operate the QIM to ensure that our quality issues are appropriately managed, and specifically to communicate with you about issues involving the products or services of the vendor with which you are associated, to authenticate you as a valid user, to assign access roles to you, and to track progress on the vendor’s response to quality issues.

Where required, such as where the GDPR applies, we will only process personal information about you where we have a lawful basis to do so. We have a legitimate interest in collecting, generating, and using the personal information for the purposes described earlier, so that we can ensure the quality of our goods and services.

## **WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA AND WHERE WILL IT BE STORED?**

Your personal data will be accessed by (1) employees of The Timken Company in the U.S. and a Timken affiliate in India performing system administration services, and (2) employees of The Timken Company and its global affiliates to communicate with you about and to track progress on responses to quality issues involving the goods or services of the vendor with which you are associated. These Timken employees may be in a country other than your country, including, among others, the United States, India, and China.

We use the QIM platform for managing the quality issues, including storing the personal information you provide or that is generated about your use of the system. This system is operated on servers controlled by Timken.

We may disclose your personal information to the purchaser of all or a portion of the business of Timken or one of its group companies. We may disclose your personal data when we have a legal duty to do so, to enforce or apply our agreements, and to protect the rights, property, or safety of Timken, our applicants, employees, customers, and providers.

## **HOW DO WE PROTECT YOUR PERSONAL DATA?**

Timken has implemented an information security program that includes physical, technical and organizational measures to protect your personal data from unauthorized disclosure or access, unlawful processing, and accidental or unlawful loss, destruction, or alteration.

We will keep the personal information that we obtain about you for as long as we need to manage our relationship with your employer, to deal with any complaints or other issues that arise, to assert or defend our legal rights, and comply with applicable laws and regulations.

## **WHAT ARE YOUR RIGHTS UNDER GDPR?**

Where the GDPR applies, you have several rights, which are subject to certain conditions and exemptions under the GDPR and its local implementing laws. These rights include the right to:

- request access to your personal information, which enables you to receive a copy of personal data we hold about you and to check that we are lawfully processing it;
- require us to correct incorrect or complete incomplete data we hold about you;
- request erasure of your personal information, which, when applicable, enables you to require us to delete or to remove your data, for example where the data is no longer necessary for the purposes of processing;
- request the transfer of your personal information to another party; and
- request the restriction of processing of your personal information, for example if you want to establish its accuracy or the reason for processing it.

You also have the right to object to the processing of your personal information where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation that makes you want to object to processing on this ground.

You will not usually have to pay a fee to access your personal information or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise any of these rights, please contact us using the contact details set out in the “Contacting Us” section of this Notice.

We strive to process your personal data in accordance with the applicable legal obligations, but if you have a complaint in that regard, please address your complaint using the contact details set out below.

If you are a data subject under GDPR, you also have the right to lodge a complaint with a supervisory authority if you are not happy with how we handle your personal data and we could not provide you with a satisfactory resolution to your request.

## **CONTACTING US**

To contact us, please contact the Data Privacy Office at The Timken Company as follows:

The Timken Company  
Data Privacy Office/Legal  
4500 Mount Pleasant Street NW  
North Canton, Ohio 44720 USA  
[DataPrivacyOffice@Timken.com](mailto:DataPrivacyOffice@Timken.com)  
+1 234.262.2207  
866.846.5369 (toll free in the U.S.)