

Timken University Consent and Privacy Notice

The purpose of this Privacy Notice ("**Notice**") is to inform you about how and why we use your personal data when you register with the Timken University learning site. This Notice applies to users who are not employees of The Timken Company or any of its global affiliates.

The Timken Company ("**we**", "**us**", or "**our**") is committed to being transparent about how we collect and use your personal data and to meeting our data protection obligations. It is important that you read this Notice so that you are aware of how and why we will use your personal information and how we will treat it.

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**"). Those portions will be identified as only applying as required by law.

CONSENT TO TRANSFER OUT OF EU

This applies to you if the GDPR applies to you.

It is important for you to know that, <u>by registering for the site, you are consenting</u> to Timken personnel outside of the EU having access to the personal information you provide during registration. Some of the countries in which the Timken personnel are located are countries, such as the United States, that the European Commission has not determined provide an adequate level of data protection, whether by the country's domestic legislation or of the international commitments it has entered into.

You <u>may revoke this consent</u> at any time by sending a request the contact information at the end of this Notice, at which time we will delete your account and the personal information you provided from the system.

PRIVACY NOTICE

WHO COLLECTS THE INFORMATION?

The controller for the personal data you submit when you register with Timken University's learning site (the "**Site**") is The Timken Company, an Ohio corporation having its global headquarters at 4500 Mount Pleasant Street NW, North Canton, Ohio 44720 USA. Our contact details 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?

When you register with the Site you will be asked to provide the following information:

- Your full name;
- Your business contact details: email address, phone number and postal address;
- Your login and password;
- Answers to 2 security questions; and
- Your preferred language and time zone.

You will not be able to register with the Site without providing this information.



We also collect information as you navigate through the site, such as the dates and times when you use the Site, usage details, IP addresses, and information collected through cookies, as explained in our <u>Cookies Policy</u>. These features allow the Site to function properly and recognize your browser when you return to the site.

WHY DO WE COLLECT YOUR PERSONAL DATA AND ON WHAT BASES?

We and the third party service provider that hosts the Site, Success Factors Inc., will use your data to process your registration and to administer the Site, including to provide you with your learning assignments.

This will include sending you emails confirming any learning assignment for which you have registered and notifying you when an item is added to or removed from your learning plan.

We may also send you emails to:

- send you a certificate of completion for courses you successfully complete
- inform you about additional training which may be added to the Site in the future
- ask you for feedback about the training we provide and our Site, how they could be improved, and how we compare to other online training sites

We may inform your employer that you have completed a training course. And we may add your contact information to our customer resource management system to associate you with your employer – our distributor.

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. For the purposes of operating the Site, it is in our legitimate interests to process your personal data as described above to register you with the Site, to administer the courses you take, and to send you the communications described above.

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

Your personal data will be accessed by administrators at The Timken Company in the U.S. so that they can administer the Site and your training courses, and to the Timken Regional Manager and other Timken sales representatives responsible for your employer's account at Timken. These Timken personnel may be located in a country other than your country, including in the United States.

The Site operates within our Human Resource Management system, called MySuccess, which is hosted and operated by Success Factors Inc., a company headquartered in the U.S., on servers located in the U.S. Success Factors Inc. is required to protect your personal data and to only act on behalf of and upon instructions from Timken, as may be required by law.

As explained above, we may also inform your employer of the learning assignments you have completed.

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. Unfortunately, the transmission of



information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us. Accordingly, any voluntary transmission by you through the Site is at your own risk.

We will keep the personal information that we obtain about you for as long as we need to in order to provide you with training and to administer the Site. You may request that we delete your account at any time by using the contact information at the end of this notice. Deletion of your account will result in the deletion of your learning history.

We will also retain your personal data if it is needed to deal with any complaints or other issues that arise or 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 a number of 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 +1 234.262.2207