

Vehicle Service Group — Privacy Notice

Effective Date: January 1, 2020

Vehicle Service Group (“VSG”) respects your individual privacy. This Privacy Policy puts you in control of how your personal data is used by us and applies to the following business services and related websites: <https://vsgdover.com/> and our VSG branded websites around the world including, as updated from time to time:

www.chieftechology.com | www.rotarylif.com | www.directlift.com | www.forwardlift.com | www.ravequipment.com | www.revolutionlift.com | www.warnauto.com | www.blitzlift.eu | www.butler.it | www.elektron-bremen.com | www.ravaglioli.com | www.spacetest.com | www.sirioequipment.com | www.hanmecsonlift.com |

This Privacy Policy describes how we collect, use, and share personal data we obtain from users of any of the VSG family companies. By choosing to visit these websites or do business with these companies, you accept the terms of this Privacy Policy. If you require this notice in an alternative accessible format, please contact us at 1.800.640.5438, 1.812.273.1622, or info@vsgdover.com.

If you are an employee of VSG or a VSG Affiliate, you should refer to the Employee Privacy Notice provided by your employer.

This Privacy Policy complements our Terms of Use available at <https://vsgdover.com/>.

Our Privacy Policy explains:

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1. WHO WE ARE AND CONTACT DETAILS

For purposes of this Privacy Policy, VSG or as applicable, its affiliated VSG branded companies around the world, are the controllers of the personal information we process, except where we act as a service provider to another business and are restricted in the processing of personal data except as directed by that business customer. VSG's global headquarters address is:

VSG World Headquarters
3005 Highland Parkway | Suite 200
Downers Grove, IL 60515

You can contact us via e-mail at info@vsgdover.com or you can call us at 1.800.640.5438 or 1.812.273.1622.

2. WHAT PERSONAL DATA WE COLLECT

We may collect the following personal data directly through you, including through your activity on our site and by your use of any of our connected devices or smart technology, from our service providers, from publicly available information, and through third parties, including but not limited to repair shops or dealerships and other businesses that we may partner with to provide you enhanced or joint products and services.

(i) Contact information and other Personal Identifiers — includes information such as your full name, email address, mailing address, phone number that you may provide on the website, when signing up for our subscription services, when signing up for our training programs and the I-CAR credit hours received (ex. Chief University), or that we may otherwise collect to market or do business with you;

(ii) Information about the device you use to access or sites and services (e.g. IP address and other Internet or other electronic network activity information including, but not limited to, browsing history, search history and information regarding your interaction with our sites, applications, or other connected devices);

(iii) Commercial information related to your relationship with VSG, for example if you are a distributor, the number of products sold;

(iv) Transaction information which includes details of products you have purchased from us, in any manner, or financial or payment card information related to a transaction where applicable;

(v) Any other information you may provide (for example, when you request more information about a product at a trade fair); and

(vi) Vehicle Identification Number (VIN #) and Repair/Work Order Number for vehicle repairs and calibration obtained through our measuring and calibration systems.

3. WHAT WE DO WITH THE PERSONAL DATA WE GATHER

We use the personal data we gather about you for the following purposes:

- (i) to understand your needs, provide you or third parties with whom you do business with products or services, and to respond to your inquiries;
- (ii) for internal analysis to see how many unique visitors visit the VSG website or otherwise use our services;
- (iii) to administer promotions, services, and offers which you register for;
- (iv) Subject to the provisions below, we will also use your personal data for other marketing-related purposes;
- (v) To improve the products and services offered through the VSG website;
- (vi) To measure the number of visitors to the VSG website and the areas of the website that are of most interest to visitors and to customize the VSG website;
- (vii) For internal record keeping
 - a. To facilitate sale of products
 - b. To keep record of repairs performed on vehicles;
- (viii) To provide training credit information to relevant parties (for example Body Shops);
- (viii) To facilitate the subscription services; and
- (ix) To audit interactions with you or concurrent transactions, detect security incidents, protection against fraudulent activity, and otherwise debug or repair errors that impair functionality to our systems and services.

To the extent permitted by applicable law, VSG may also use your personal data as we believe to be necessary or appropriate:

- (i) under applicable law, including laws outside your country of residence;
- (ii) to comply with legal process;
- (iii) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (iv) to enforce our terms and conditions;
- (v) to protect our operations or those of any of our affiliates;
- (vi) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others;
- (vii) to allow us to pursue available remedies or limit the damages that we may sustain; and
- (viii) to retain records on the vehicle repairs/calibrations performed.

We do not use the personal data that you provide to make automated decisions about you.

4. MARKETING

Where required by local law, we will obtain your prior consent:

- (i) in order to send you marketing communications about VSG brands;
- (ii) in order to provide your personal data to VSG Affiliates for their marketing purposes; and
- (iii) in order to provide your personal data to third parties and other partners for joint marketing efforts or their own marketing efforts.

Please note that you always have the right to withdraw your consent.

Otherwise, we may contact you by email, phone, fax, mail, or other means unless you direct us not to do so.

We may use your personal data for our own marketing purposes, including, but not limited to notifying you of new services, offers or other information via mail, email, telephone, text message, and other means.

If you do not want us to use your personal data for marketing purposes or to provide your personal data to VSG Affiliates or to third parties for their marketing purposes, you may opt-out of such uses by notifying us in accordance with the procedure set forth below under the heading, "Rights to your Personal Data."

5. DATA SHARING

We may share your personal data with our affiliates (i.e., affiliated businesses and operating companies) (collectively, "VSG Affiliates") in pursuance of the purposes set out in section 3 above.

We may share your personal data with third party service providers (including contractors who provide services to us) to assist with any of the uses of personal data described above.

We may also share your personal data with distributors that use contact information for distribution outreach, including marketing of VSG products and services.

We may also disclose your personal data to third parties if disclosure is required to comply with applicable laws or regulations; comply with legal process or a court order; to respond to requests from public and government authorities; or if disclosure is necessary to enforce our Privacy Policy and/or Terms of Use; to protect your safety or security; to protect our rights, the safety and security of our site and property or that of VSG Affiliates or third parties; to allow us to pursue available remedies or limit the damages we may sustain.

We may share or transfer your personal data to a third party if VSG enters into, or is involved in, a business transaction such as a merger, acquisition, reorganization, or sale of some or all of its assets.

In certain limited circumstances, we may sell personal information about you including your VIN # collected through our measuring and calibration systems to third parties, including but not limited to vehicle repair shops, vehicle manufacturers, automotive insurance companies, and other third

parties. For vehicle repair shops, this may include prior repair information that helps them better assess repair needs and confirm prior repairs were done properly.

6. LAWFUL BASES

Under the laws in the EU, we are required to identify the lawful bases for which we use your personal data. These are:

- (i) Legitimate Interest — we have a legitimate interest in contacting you where you provide us with your details, to manage our relationship with you and to monitor and improve the use of any VSG branded website, and to send you marketing communications;
- (ii) Consent — where we are required by local law to collect consent in order to send you marketing communications; and
- (iii) Compliance with a legal obligation — where we are required to collect and disclose your personal data because we are subject to a legal or regulatory obligation.

We do not intend to collect any sensitive personal data (which is defined under EU law to include, for example, personal data on ethnicity, racial origin, and health) through the VSG branded websites.

Where we rely on the legitimate interest lawful basis to use your personal data, you always have the right to object to such use by contacting us using the details above.

Where we rely on your consent to use your personal data, you always have the right to withdraw your consent at any time by contacting us using the details above.

7. SECURITY AND CONFIDENTIALITY

We are committed to ensuring that your personal data is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the personal data we collect online. However, we are not able to guarantee the confidentiality of non-confidential data such as feedback, questions, comments or ideas that you voluntarily provide to us (e.g., via the “Contact” tab or similar features on the VSG branded websites). We reserve the right to use and disclose such non-confidential information as we deem appropriate in compliance with applicable law.

There is no perfect security, and reasonable security is a process that involves risk management rather than risk elimination. While we are committed to developing, implementing, maintaining, monitoring, and updating a reasonable information security program, no such program can be perfect; in other words, all risk cannot reasonably be eliminated. Data security incidents and breaches can occur due to vulnerabilities, criminal exploits, or other factors that cannot reasonably be prevented. Accordingly, while our reasonable security program is designed to manage data security risks and thus help prevent data security incidents and breaches, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security measures.

8. HOW LONG WILL WE HOLD YOUR PERSONAL DATA

We will retain your personal data for as long as:

- (i) we have a relationship with you;
- (ii) we are required by law; or
- (iii) we need to in order to protect ourselves as a business or protect any other third party.

If you have any questions about our retention policy, please contact us using the details set out above.

9. TRANSFERS OF PERSONAL DATA

As a global organization, we will transfer your personal data across borders. VSG is based in the US although our VSG Affiliates are located in countries worldwide. Where a transfer of personal data across borders is required to comply with applicable laws, we will implement appropriate or suitable safeguards (such as EU Commission approved Standard Contractual Clauses) to protect that personal data. Please contact us using our details above should you require further information.

10. THIRD PARTY SITES AND SERVICES

The VSG website and VSG branded websites may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other web site. Therefore, we cannot be responsible for the protection and privacy of any personal data which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. You should exercise caution and look at the privacy statement applicable to the web site in question.

VSG companies may also serve as a service provider to other third party businesses, and in those instances, VSG processes personal data in accordance with the instructions of that business client. Similarly, where VSG partners with another third party business to offer you additional features, that business is subject to their own privacy policy. We encourage you to review the privacy statements of any third party companies with which you intentionally interact.

11. RIGHTS TO YOUR PERSONAL DATA

Under certain laws, you have the right to seek access to your personal data, seek rectification or erasure of your personal data, restrict our use of your personal data, object to our use of personal data, or request data portability. Please contact us if you wish to exercise any of these rights.

In any event, you can always ask us for more information about the people who will be able to see and access your personal data.

In accordance with applicable laws, you may choose to restrict the collection or use of your personal data by us by emailing us at info@vsgdover.com. This includes where you:

(i) have previously not objected to us using your personal data for our direct marketing purposes but now wish to opt-out of receiving future marketing emails from us;

(ii) want to opt-out of any new uses of personal data permitted by this Privacy Policy caused by changes in our information practices;

(iii) do not want us to share your personal data with VSG Affiliates and/or our business (and other) partners for marketing purposes;

(iv) believe that personal data we are holding on you is incorrect or incomplete so that we can consider your concern and, where appropriate, we will promptly correct any personal data found to be incorrect. Or, you may contact us if you wish to review or change your personal data by using the "Contact" tab on our home page; or

(v) do not want to be contacted by us in the future (unless you initiate the contact).

Individuals who are residents of California have certain consumer rights under applicable California privacy laws, which are subject to certain limitations and/or restrictions. Specifically, under California law you may have the right to:

- Request that we disclose information about the personal information collected, used, disclosed, or sold;
- Request that we delete personal information collected or maintained by us;
- Opt out of the sale of your personal information, if there are any sales of personal information; and
- Not receive discriminatory treatment for exercising your privacy rights.

Note that if you make such a request, we must verify your request before we can respond. Whenever feasible, we will match at least two data points in the identifying information provided by the consumer to the Personal Information already maintained by us, but it may require more data points depending on the information requested. We will avoid collecting highly sensitive pieces of personal information, unless necessary. If we cannot verify your identity, we may need to deny your request. We will generally respond within 45 days. A consumer may use an authorized agent to submit a request on the consumer's behalf. When using an authorized agent, we require that you provide the authorized agent written permission to do so and verify their own identity and agent status with us. If you are placing a request on behalf of a household, we will need a verified request on behalf of each member of the household.

If you wish to exercise any of your rights under this section, you may submit your request via any of these methods: You may write to us at the above address (located at the beginning of this Privacy Policy) or call us at 1.800.640.5438 or 1.812.273.1622.

Click [here](#) to opt out of the sale of your personal information.

Note that where we act as a service provider to another business, we will direct your request to that business.

12. PERSONS UNDER 16

We do not knowingly collect or allow the collection of personal data from persons under the age of 16. If you are the parent or guardian of a person under the age of 16 and believe that the person has provided personal data to us, please contact us at info@vsqdoover.com.

13. COOKIES AND OTHER TRACKING TECHNOLOGIES

When you visit the VSG website or any VSG branded website, we may use “cookies” and similar technologies to help us recognize and serve you better. Cookies are small files that contain information sent by a web site that is saved on your computer’s hard drive. You may delete cookies from your computer or set your browser to reject cookies. However, doing so may limit some functionalities of our site. Please see our Cookies Policy for more information about our use of these technologies on the Dover website. **Learn more.** Some websites have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.

14. HOW TO CONTACT US

If you have any questions, comments or concerns, or wish to exercise any of your privacy rights, you may contact us by

- Writing us at:
Vehicle Service Group, LLC
Attn: Consumer Privacy Office
2700 Lanier Drive
Madison, IN 47250
- Calling us toll free at: 1.800.640.5438
- Or emailing us at: info@vsqdoover.com.

If for any reason you are dissatisfied with our handling of your requests or have other concerns about our data processing practices, depending on where you are located, you may also have a right to raise your concerns or complain to your local data protection regulator.

15. UPDATES TO THIS PRIVACY POLICY

We may update this Privacy Policy at any time to reflect changes in our business practices, technologies, customer expectations, or the law by posting a new version on our website, and updating the “effective date” at the top of this webpage. If we update this Privacy Policy in a way that materially changes how we use your personal data, we will bring these changes to your attention where reasonably possible. Otherwise, we recommend that you periodically review this Privacy Policy to be aware of any other revisions.