

DRAXTON WEBSITE PRIVACY NOTICE

At Draxton Global S.L.U., Draxton Powertrain & Chassis S.L.U., Draxton Europe & Asia, S.L., Draxton4C, A.I.E., European Brakes and Chassis Components Sp. z o.o., Draxton Brno s.r.o., and Infun For, S.R.L. (hereinafter, “DRAXTON”), we recognize the value of your privacy, the protection of your personal data, as well as your right to informational self-determination.

This Privacy Notice (the “Notice”) applies globally within the European scope and aims to inform you of the manner in which personal data that you voluntarily provide through the contact channels (e-mail, postal address, telephone) made available on the following website www.draxton.com (hereinafter, the “Website”) is obtained, collected, used, disclosed, stored or, in general, processed.

This Notice is provided in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (the “GDPR”), Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights (the “LOPDGDD”), as well as other similar or equivalent legislation applicable in the countries where any of the DRAXTON companies processing your personal data are located.

This Notice applies globally within the European scope, without prejudice to other notices that may be made available to you by DRAXTON companies depending on the processing of your personal data.

Data Controller

Whenever personal data is collected and processed through the Website, your information will be stored in a database controlled by DRAXTON EUROPE & ASIA, S.L., with registered address at Camí de Can Ubach, 25–35, Polígono Industrial Les Fallulles, 08620 Sant Vicenç dels Horts (Barcelona, Spain), unless otherwise indicated.

If the user contacts any of the entities forming part of DRAXTON through the Website (e-mail, postal address, telephone), the user consents to their personal data also being processed by the subsidiary to which the request is addressed. In such case, such entity shall also act as controller in accordance with the legislation applicable in the country in which it is located. The user must take this into account when exercising their rights of access, rectification, erasure, objection, restriction of processing, data portability and the right not to be subject to decisions based solely on automated processing when they have directly contacted a group company through those channels.

Considering the above, you may contact any DRAXTON entity to which you have submitted your personal data, as indicated below.

In the case of DRAXTON companies incorporated under Spanish law, the following entity shall act as representative of the different data controllers:

- Corporate name: Draxton Europe & Asia, S.L.
- Address: Calle Autonomía 4, 48291 Atxondo (Vizcaya), Spain
- Telephone: +34 94 623 80 11
- Contact e-mail: gdpr@draxton.com

In other cases, please use any of the following contact details:

- European Brakes and Chassis Components Sp. z o.o.
Address: Bysrzyca 89, Wroclaw, 54-2015, Poland
Telephone: +48 71 784 61 01
E-mail: gdpr@draxton.com
- Draxton Brno s.r.o.
Address: 15, Vodařská 108, Horní Heršpice, 619 00 Brno-jih, Czech Republic
Telephone: +420 544 509 910
E-mail: gdpr@draxton.com
- Infun For, S.R.L.
Address: Viale delle Industrie 10, 45100 Rovigo, Italy
Telephone: +39 425403311
E-mail: gdpr@draxton.com

Personal Data Collected

You may browse the Website without providing personal data; however, there are certain sections where you may voluntarily provide data such as: name, address, e-mail address, telephone number, curriculum vitae and other identification data. For example, when contacting us to request information about DRAXTON companies or products, registering as a supplier, submitting comments or suggestions, or applying for a position at any DRAXTON company.

Certain features and access to the Website are reserved exclusively for registered users, such as the “Supplier Portal” or “Careers” section. Usernames and passwords for those portals are assigned by our Information Technology department. These data are used exclusively to grant access to registered users (suppliers, potential candidates) and to personalize Website functionalities.

How We Use Your Personal Data

The personal data you choose to share with us through the Website will be used to identify and contact you, as well as to include you in our databases and provide you with information that we consider may be of interest to you.

On the other hand, if you are a supplier or wish to become one, specific conditions will apply to the processing of your personal data, which will be provided prior to collecting your personal data through the corresponding Privacy Notice.

The personal data you provide will be retained for as long as necessary to fulfill the purposes described.

Security Measures / Access Restrictions

DRAXTON has adopted technical, administrative and physical security measures necessary to ensure the integrity and confidentiality of your personal data and to prevent damage, loss, alteration, destruction or unauthorized use, access or processing. However, no data transmission over the Internet is completely secure, and therefore DRAXTON cannot guarantee that the processing of your personal data will be free from such risks.

Measures may include:

- (i) Encryption or anonymization of personal data where legally required
- (ii) Contractual measures to ensure confidentiality and integrity
- (iii) Internal procedures to ensure compliance with applicable regulations
- (iv) Technical measures to ensure resilience and robustness of systems

Only authorized personnel who have complied with confidentiality obligations may process your personal data.

How We Share Personal Data

DRAXTON does not sell, assign or transfer personal data to third parties unrelated to DRAXTON without prior consent of the data subject.

The company will transfer your personal data to competent governmental authorities, whether national or foreign, to comply with legal obligations.

Due to DRAXTON's international nature and shared systems and processes, personal data may be shared between entities of the group. Such transfers are carried out in accordance with applicable regulations and the principle of purpose limitation. Where necessary, appropriate agreements are entered into.

In other cases, DRAXTON may allow third parties access to personal data where necessary for the performance of a contract, provided they offer sufficient guarantees of compliance.

Outside of these cases, personal data will not be transferred except as required by law.

Retention Period

DRAXTON will not retain personal data for longer than permitted by applicable laws and regulations in each case, nor for longer than justified for the purposes for which the data were originally collected. As a general rule, personal data will be erased once the purpose that gave rise to the processing ceases to exist and there is no reasonable expectation that such data may be useful for that purpose in the future. In certain cases, personal data may be retained until the expiration of a statutory limitation period or an applicable administrative period, in order to safeguard the rights or interests of the data controller.

Links

For your convenience, the Website may contain links to other websites. Please note that this Privacy Notice applies solely to the Website and not to the websites of other companies or organizations to which the Website may redirect. DRAXTON has not reviewed the privacy policies of such websites and therefore does not guarantee nor assume any responsibility for the content of such links. We encourage you to carefully review the privacy policy of each of the websites linked from the Website.

Minors

The services available on the Website are intended for individuals over 18 years of age.

Third-Party Data

In the event that the user provides personal data relating to third parties, the user represents and warrants that they have obtained the prior consent of such individuals and have informed them in advance of the conditions and purposes for which DRAXTON will process their personal data. If required by DRAXTON, the user shall provide evidence that such consent has been obtained.

Data Accuracy

The personal data provided by the user must be accurate and truthful. In all cases, it shall be the user's responsibility to notify DRAXTON of any changes to their personal data so that DRAXTON may keep such data updated at all times.

Your Rights

As a data subject, you may exercise your rights of access, rectification, erasure and objection before the Compliance and Data Protection Committee via the email address

gdpr@draxon.com. These rights are personal in nature and may be exercised at any time in accordance with applicable regulations.

The rights are described as follows:

- (i) Right of access. You may obtain information regarding the processing of your personal data.
- (ii) Right to rectification. You may correct or modify your data if it is inaccurate or incomplete.
- (iii) Right to erasure (right to be forgotten). You may request the deletion of your personal data.
- (iv) Right to object. You may request that your data is not processed or that processing ceases.
- (v) Right to data portability. You may transfer your data between controllers under certain conditions.
- (vi) Right to restriction of processing. You may request limitation of processing under applicable conditions.
- (vii) Right not to be subject to automated decisions. You may ensure that you are not subject to decisions based solely on automated processing, including profiling.

You may also withdraw your consent at any time and limit the use or disclosure of your personal data. DRAXTON will make available on the Website suggested forms to exercise these rights.

Changes to this Privacy Notice

We reserve the right to make changes to this Privacy Notice; therefore, we recommend that you review it periodically in order to be aware of the most recent modifications. The applicable Privacy Notice will be published on the Website and will indicate the date of its latest revision. Use of the Website constitutes evidence that you have read, understood and accepted the Privacy Notice in force at the time of such use.

Contact

If you have any questions or wish to exercise your rights, please contact the Compliance and Data Protection Committee via the email address gdpr@draxon.com. You may also contact any DRAXTON company using the contact details provided in the Data Controller section of this Notice.