

## HARTWELL CORPORATION PRIVACY POLICY

Last Updated: 01-09-2023

This Privacy Policy describes how COMPANY (“Company” or “we” or “us” or “our”) collects, uses, shares, and otherwise processes personal data about individuals when they visit our website hartwellcorp.com or any other site that links to this Privacy Policy (our “Sites”), engage in business with us, apply for a job with our company, or otherwise interact with us online and offline (altogether referred to as our “Business”). This Privacy Policy does not cover our data handling practices for our employee data. For purposes of this Privacy Policy, “Personal Data” means any information that is related to or is reasonably capable of being associated with an individual.

### I. Collection of Personal Data

We collect Personal Data from our business contacts and from our job applicants. We collect the following Personal Data directly from our business contacts and from our third party business partners:

- **Identifiers and contact information**, such as your name, account identifiers, email address, IP address, postal address, phone number, or other similar information related to your role as a representative of your company
- **Professional or employment-related information**, such as your company name and job responsibilities
- **Geolocation information**
- **Audio and visual information**, such as information captured by our security cameras when you visit our locations in person, or information potentially captured by call recordings when you contact us with your inquiries
- **Internet and other electronic network activity information**, such as your unique device identifiers or data about usage of and interaction with our Sites or advertisements, and information collected from cookies and other data tracking technologies

When individuals wish to apply to a job with us, we collect the following Personal Data directly from our job applicants and from our third-party business partners, such as our recruiters:

- **Identifiers and contact information**, such as your name, postal address, IP address, email address, or other similar identifiers and contact information
- **Certain protected characteristics about you**, such as your ethnic or racial background, your veteran status, your disability status, or sexual orientation information
- **Professional or employment-related information**, such as your work history and professional experience
- **Immigration status** to determine work eligibility status
- We may draw **inferences about applicants’ characteristics, abilities, and aptitudes** with Personal Data provided to us in connection with an application
- Any other Personal Data you choose to provide to us in connection with your application

## II. Use of Personal Data

We use the Personal Data referenced above, as appropriate and reasonably necessary, for the following purposes:

- **To conduct engage in the ordinary course of business:** We use all categories of Personal Data, as appropriate and reasonably necessary.
- **To respond to inquiries:** We use all categories of Personal Data, as appropriate and reasonably necessary.
- **To protect the security and functionality of our information technology systems:** We use all categories of Personal Data, as appropriate and reasonably necessary, but primarily internet and other electronic network activity information
- **To provide relevant marketing communications to you:** We use all categories of Personal Data, as appropriate and reasonably necessary.
- **To address our compliance and legal obligations:** We use all categories of Personal Data, as appropriate and reasonably necessary.
- **To consider individuals for employment or contractor opportunities, and to manage on-boarding procedures:** We use all Personal Data referenced above in connection with job applicants.

## III. Disclosure of Personal Data

We disclose Personal Data with the following categories of recipients:

- **With our service providers and suppliers:** We disclose Personal Data with suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above, such as marketing and web hosting. We require such parties by contract to provide reasonable security for Personal Data and to use and process such Personal Data only on our behalf and only at our instruction.
- **With our corporate family:** We disclose Personal Data to other entities in our TransDigm Group family as necessary for the purposes identified above.
- **In connection with a reorganization event:** We may disclose, transfer or assign your Personal Data in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of the Company.
- **To other third parties:** For example, we may be required to provide Personal Data to law enforcement or other governmental authorities when we believe, in good faith, that (i) you or others are acting unlawfully; (ii) it is necessary or appropriate to meet our legal obligations; (iii) it is necessary to protect or defend our rights or the rights or well-being of our customers or other users of our Services; or (iv) it is necessary to protect the health and safety of our personnel, customers, guests, and the general public.

## IV. Legal Basis for Processing Personal Data

We have several different legal grounds on which we collect and process Personal Data, including:

- as necessary to perform a transaction;

- as necessary to comply with a legal obligation (such as when we use Personal Data for record keeping to substantiate tax liability);
- consent (where you have provided consent as appropriate under applicable law, such as certain cookies); and
- necessary for legitimate interests (such as when we act to maintain our business generally, including maintaining the safety and security of the Site).

With respect to legitimate interests, we typically collect and process limited Personal Data about business contacts and other individuals acting in their business capacities. Further, as a processor/service provider to our customers, we process Personal Data in accordance with our customers' instructions with respect to individuals with whom we do not have a direct relationship.

In certain circumstances where we rely on your consent to process your Personal Data, you will have the right to revoke your consent to processing. Please note that under certain circumstances, revoking or withdrawing your consent may result in us not being able to conduct our business obligation to you.

## V. Cookies and Similar Data Collection Technologies

We use cookies and other similar data collection technologies (collectively referred to as "Cookies") on our Sites. Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. This information might be about you, your preferences or your device and is mostly used to make the Site work as you expect it to. The information can potentially identify you, and typically is used to provide you a more personalized web experience. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website. More information about cookies and how they work is available at <https://www.allaboutcookies.org/>. We use Cookies enable the functionality of our Sites and provide you with a more personalized experience.

Cookies on our Sites are generally divided into the following categories:

- **Strictly Necessary Cookies:** These are required for the operation of our Sites. They include, for example, cookies that enable you to log into secure areas. These cookies are session cookies that are erased when you close your browser.
- **Analytical/Performance Cookies:** These allow us to recognize and count the number of users of our Sites and understand how such users navigate through our Sites. This helps to improve how our Sites work, for example, by ensuring that users can find what they are looking for easily. These cookies are session cookies which are erased when you close your browser. When permitted by law, we use Google Analytics, and you can see below for how to control the use of cookies by Google Analytics.
- **Functionality Cookies:** These improve the functional performance of our Sites and make it easier for you to use. For example, cookies are used to remember that you have previously visited the Sites and asked to remain logged into it. These cookies qualify as persistent

cookies, because they remain on your device for us to use during a next visit to our Sites. You can delete these cookies via your browser settings.

**Controlling Cookie Preferences.** Certain Cookies, such as the strictly necessary cookies cannot be disabled because they are essential for the operation of the Sites. If you would like to review or update your preferences regarding which Cookies you would like to accept, please visit our Cookie management tool here.

**Do Not Track Signals.** Some web browsers incorporate a “Do Not Track” or “DNT” feature that signals to websites that a user does not want to have their online activity or behavior tracked. Not all browsers offer a DNT option and DNT signals are not yet uniform. As such, many website operators, including our Sites, do not recognize or respond to DNT signals.

## **VI. Your Rights and Choices**

**Your Privacy Rights.** In certain jurisdictions, individuals may have certain rights involving their Personal Data and how we process their Personal Data. Generally, these rights include the right to access, delete, modify, correct, and limit certain processing relating to their Personal Data. Not all jurisdictions provide for these privacy rights and not all jurisdictions provide for the same rights. To exercise any of the rights identified below, please use the information under “Contact Us” below and let us know which right you were like to exercise (unless other instructions are specified below in their relevant jurisdictions). We may request additional information from you to verify your identity and process your request. When permitted by law, we may also charge a small fee to process some of your privacy requests.

The following provides additional disclosures regarding such rights available in certain jurisdictions.

### **A. Notice to Residents in California, Colorado, Connecticut, Utah, and Virginia**

If you reside in California, Colorado, Connecticut, Utah, or Virginia, you may have certain rights under the laws of these states.

We do not sell your Personal Data to third parties in exchange for monetary benefit.

We do not “sell” or “share,” as those terms are defined under applicable California privacy laws, the Personal Data of children under 16 years old.

***Privacy Rights.*** Depending on which state you reside in, you may have the following rights with respect to your Personal Data:

- **Right to access your Personal Data**
- **Right to rectify or correct inaccuracies regarding your Personal Data**
- **Right to request deletion of your Personal Data under certain circumstances**
- **Right to obtain a copy of your Personal Data in a portable format**
- **Right to limit the use and disclosure of your sensitive Personal Data**

If you exercise any of these privacy rights, we will not discriminate against you by offering you different pricing or services, or by providing you with a different level of quality of services, based solely upon your request. To exercise your rights, please contact us at our toll-free number: 1-714-993-4200 or by using the information provided below “Contact Us.” You may be able to designate an authorized agent to exercise your rights on your behalf. We will take steps to verify your or your authorized agent’s identity when we process your request.

**California “Shine the Light” Law.** California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Sites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not share your Personal Data to third parties for their own direct marketing purposes.

#### **B. Notice to Residents in the EU/EEA/UK**

If you are a resident in the EU, EEA, or UK, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion/erasure of your Personal Data under certain circumstances
- To object to the processing of your Personal Data that is being processed on the basis of legitimate interests
- To request restriction of processing of your Personal Information
- To data portability
- To withdraw your consent
- To lodge a complaint with the relevant data protection supervisory authority

To exercise your rights, please use the information provided under “Contact Us” below. Where applicable, you can find contact information for your data protection supervisory authority on the European Data Protection Board’s website [https://edpb.europa.eu/about-edpb/about-edpb/members\\_en](https://edpb.europa.eu/about-edpb/about-edpb/members_en), or through other publicly available sources.

#### **C. Notice to Residents of Canada**

If you are a resident of Canada, you may have the following rights. Please note that rights may vary depending on which province you are located in and may be subject to certain restrictions and limitations.

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion of your Personal Data under certain circumstances, including, for example, to request that the Company cease dissemination of Personal Data or de-index a hyperlink that provides access to Personal Data by a technological means
- To withdraw consent for processing your Personal Data under certain circumstances

#### **D. Notice to Residents of Mexico**

If you are a resident of Mexico, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion of your Personal Data under certain circumstances
- To object to the processing of your Personal Data
- To limit the use and disclosure of your Personal Data
- To withdraw consent

**E. Notice to Residents of Brazil**

If you are a resident of Brazil, you may have the following rights:

- To confirm the existence of processing of your Personal Data
- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion of your Personal Data under certain circumstances
- To data portability
- To withdraw consent
- To review decisions made solely based on automated processing of Personal Data in a way that affects your interests
- To petition against processing before a supervisory authority

**F. Notice to Residents of the People’s Republic of China (“PRC”)**

If you are a resident of the PRC, you may have the following rights:

- To access, consult or obtain a copy of your Personal Data
- To make decisions regarding the processing of your Personal Data
- To restrict or refuse the processing of your Personal Data
- To request rectification or supplementation of your Personal Data
- To request deletion of your Personal Data under certain circumstances
- To request an explanation regarding this Privacy Policy
- To withdraw consent to processing

**G. Notice to Residents of Singapore**

If you are a resident of Singapore, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To withdraw consent to collection, use, or disclosure of Personal Data

**H. Notice to Residents of Hong Kong**

If you are a resident of Hong Kong, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data

**I. Notice to Residents of Malaysia**

If you are a resident of Malaysia, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To withdraw consent

- To prevent processing that is likely to cause damage or distress
- To prevent processing for direct marketing purposes

#### **J. Notice to Residents of Japan**

If you are a resident of Japan, you may have the following rights:

- To access your Personal Data under certain circumstances
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion of your Personal Data
- To request cessation of use of your Personal Data under certain circumstances

#### **K. Notice to Residents of India**

If you are a resident of India, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To withdraw consent

#### **L. Notice to Residents of Sri Lanka**

If you are a resident of Sri Lanka, you may have the following rights:

- To access your Personal Data under certain circumstances

#### **M. Notice to Residents of Israel**

If you are a resident of Israel, you may have the following rights:

- To access your Personal Data
- To rectify or correct inaccuracies regarding your Personal Data
- To request deletion of Personal Data under certain circumstances
- To request deletion of Personal Data used for direct mailing purposes

### **VII. Data Retention**

We typically retain Personal Data for no longer than for the period necessary to fulfill the purposes outlined in this Privacy Policy and as otherwise needed to address our legal obligations.

### **VIII. Data Security**

We have implemented reasonable and appropriate safeguards designed to protect your Personal Data from loss, misuses, alteration, or destruction. We also take reasonable and appropriate steps designed to ensure that third parties who work with us agree to protect Personal Data we disclose to them or that they process on our behalf.

That said, please understand that no security measure can guarantee absolute security. As such, we cannot guarantee that your Personal Data will be 100% secure. We encourage you to take precautions when providing your Personal Data to us or others. If you believe your Personal Data has been compromised in connection with your business dealings with us, please immediately contact us as detailed in “Contact Us” below.

### **IX. Cross-Border Data Transfers**

We transfer Personal Data to various jurisdictions as necessary for the purposes described in this Privacy Policy. Some of these jurisdictions may not provide the same level of data protection as

your home country. We take reasonable and appropriate steps designed to provide appropriate protections for cross-border transfers as required by law. For example, in connection with certain international transfers, we implement standard contractual clauses approved by regulatory authorities of the relevant jurisdiction and other safeguards designed to protect your Personal Data. In certain jurisdictions, you may have the right to request a copy of the mechanisms we have in place by contact us as detailed below under “Contact Us.”

#### **X. Information Relating to Minors**

Our services are not intended for minors under the age of 16 and we do not knowingly collect any Personal Data from minors under the age of 16 without prior consent as required by applicable law. If you believe a minor under the age of 16 has provided us with Personal Data, please contact us using the information provided in “Contact Us” below. We will take reasonable measures to delete information as soon as possible and not use such information for any purpose, except where necessary to protect the safety of the minor or others as required or allowed by law.

#### **XI. Links to Third Party Websites**

Our Sites, Business, and materials may contain references or links to third-party websites and services. Except as described above regarding service providers and suppliers, we do not control what information third parties track or collect. Use or access to those third-party websites are not governed by this Privacy Policy. We encourage you to review the privacy policies of any such third-party website or service you may access or use.

#### **XII. Changes to this Privacy Policy**

We may update this Privacy Policy to reflect changes in our practices. When we post modifications to this Privacy Policy, we will update the “Last Updated” date on the top of this web page. We encourage you to periodically review this page for the latest information on our privacy practices.

#### **XIII. Contact Us**

If you have any questions or comments regarding this Privacy Policy or our privacy practices, please contact us at:

Mailing Address: 900 S. Richfield Rd, Placentia CA 92870

Email: [gdpr@hartwellcorp.com](mailto:gdpr@hartwellcorp.com)

Phone: 1-714-993-4200