

KLÜBER LUBRICATION NA LP

February 14, 2020

## Privacy Policy

### ABOUT THIS PRIVACY POLICY

Thank you for visiting the SUMMIT website (“Website”), which is operated by KLÜBER LUBRICATION NA LP (KLÜBER LUBRICATION, “we” or “our”). This Privacy Statement explains the types of information KLÜBER LUBRICATION obtains about users of the Website and how the information is collected, used and disclosed by KLÜBER LUBRICATION. This Website is directed to business-to-business users in the United States, and this policy only applies to information collected through the Website. This Website is not intended for users who are looking to purchase our products for consumer use. By submitting your personal information to us, you are accepting and consent to the practices described in this Privacy Statement.

Our business changes from time to time and our Privacy Policy will change also. Your continued use of our Website following the posting of any amendment to this Privacy Statement shall indicate your acceptance of the revised Privacy Policy.

If you have any questions about this Policy, including if you wish to send us a request to exercise any of your legal rights, please contact us at [privacy@us.kluber.com](mailto:privacy@us.kluber.com).

### 1. Types of Personal Information We Collect and When

**Server log information.** Our Website captures certain information automatically. This information may include your Internet protocol (IP) address, browser type and computer operating system, time and date you visit, the pages you access, and the address of the page that directed you to our Website. We use this data to understand patterns of Website activity and to improve the Website so it is more useful for you. This information is not linked in any way to your personal information.

**Cookies.** Our Website uses cookies, which record small amounts of data in your web browser. These serve various purposes, including making our site work properly and optimizing your experience. The cookies we use – and how to control them – are listed in our Cookies Policy.

**Personal information that you submit.** We do not collect personal information from you unless you supply it voluntarily such as when you communicate with us by email, register on the Website, download a document, and register for a newsletter or an event. The types of personally identifiable information that may be requested include your name, mailing address, email address, or telephone number or other information relevant to a request for information.

**Aggregated or anonymized information.** In some instances, we receive information that either combines the information of numerous consumers or is transformed in such a way that the information can no longer be linked to a particular consumer or their household.

### 2. Purposes for Which We Collect Information

We request personal information when necessary to provide a service or to complete a transaction or otherwise run our business. Examples include subscribing to electronic newsletters, registering for an event, requesting product information, a quote, or technical advice, registering on the Website, downloading documents, responding to your questions or comments or completing online surveys or questionnaires.

### 3. How Do We Protect Personal Information?

Although we cannot guarantee impenetrability of our servers, we have established physical, electronic, and procedural safeguards for the information we collect on this Website that are reasonable given the nature of the information and its sensitivity.

### 4. What Do We Do With the Personal Information We Collect?

When you submit product reviews or other content that will be posted on the Website please remember it becomes public information, and you should exercise caution when deciding to disclose your personal information.

We will not sell, trade, or otherwise transfer to third parties your personally identifiable information unless we provide you with advance notice, except that we may share this data with our parent company, subsidiaries, affiliates, and vendors we retain to provide services necessary to our operations. Such third parties could include website hosting companies, public relations companies, advertising and marketing agencies, and mail delivery service companies. These parties are under obligations to use the information only in support of our business, not their own.

We also reserve the right to release personal information (i) when we are under legal compulsion to do so (e.g., we have received a subpoena) or we otherwise believe that the law requires us to do so; (ii) when we believe it is necessary to protect and/or enforce the rights, property interests, or safety of KLÜBER LUBRICATION, our users or others; or (iii) as we deem necessary to resolve disputes, troubleshoot problems, prevent fraud, and otherwise enforce the Privacy Statement and any applicable Terms of Use for our Website.

Additionally, in the event that KLÜBER LUBRICATION is merged with or becomes part of another organization, or in the event that KLÜBER LUBRICATION is sold or it sells all or substantially all of its assets or is otherwise reorganized, the information you provide will be one of the transferred assets to the acquiring or reorganized entity. We may also transfer personal information to third parties where we are expressly authorized by applicable law to do so.

### 5. For California Residents

Under the California Consumer Privacy Act ("CCPA"), you have certain rights with regard to information that could reasonably be used to identify you or your family. This Privacy Notice is provided so that you can understand at or before the point of collection what we are collecting and why.

**Right to Access and Data Portability.** You have the right to understand what information we have collected about you, where it came from, why we collected it, with whom we have shared it. You are also entitled to a copy of the information.

**Right to Erasure.** With regard to the right of erasure of your personal information, we will erase your personal information when requested except when, as provided by CCPA, it is necessary to:

a. Complete a transaction for which the personal information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us.

b. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.

c. Debug to identify and repair errors that impair existing intended functionality.

d. Exercise free speech, ensure the right of another consumer to exercise his or her right of free speech, or exercise another right provided for by law.

e. Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.

f. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.

g. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.

h. Comply with a legal obligation.

i. Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

These rights do not extend to anonymized or aggregated information that can no longer be connected to you personally.

Consistent with CCPA, we will respond within 45 days of a verifiable request to provide or erase your personal information, unless we notify you that up to another 45 days will be needed.

Our website is not directed at persons under the age of 13, and we do not knowingly store personal information of any kind relating to such persons. If you are the parent or guardian of a minor and believe that minor's personal information has been collected, please contact us so that we may delete it.

**Right to Opt-Out of the Sale of Your Personal Information.** KLÜBER LUBRICATION does not sell personal information and has not done so in the past twelve (12) months. In the event that KLÜBER LUBRICATION conducts activities that may constitute the sale of personal information under California law, it will provide the appropriate notice and an opportunity to opt out.

To exercise your rights, please contact [privacy@us.kluber.com](mailto:privacy@us.kluber.com).

## **6. How Can You Opt Out of Emails and Block or Restrict Cookies?**

**Emails.** You can opt out of receiving future promotional electronic mailings from us by following the unsubscribe procedures indicated in each electronic mailing, such as "unsubscribe" or "manage your preferences."

**Cookies.** We use cookies to keep track of and enhance certain user activities on our Website such as saving your preferences and user-specific features. You may block or restrict cookies on your computer or purge them from your browser by adjusting your web browser preferences.

You should consult the operating instructions that apply to your browser for instructions on how to configure your browser setting to meet your preferences.

However, because cookies may allow you to take advantage of some features or functions of our Website, we recommend that you leave them turned on.

More information is contained in our Cookies Policy.

## **7. How Can You Update Your Personal Information?**

Website Registration. If you have an account on this Website that requires a user identification and password, you can update the information you have provided to us in the account section of the Website.

Please also review our Contact page for ways to contact us so you can update your information.

## **8. What About Links to Other Websites?**

This statement applies only to this Website. This Website may contain links to third party websites. We are not responsible for the content or policies of such websites and recommend that you check the privacy statements posted on their websites.

How Do I Ask Questions and Provide Feedback Regarding Privacy?

We welcome your questions, comments and concerns about privacy. KLÜBER LUBRICATION is committed to the resolution of concerns about your privacy and our collection or use of your personal information. If you have any questions regarding this privacy statement or how we protect your personal data, please contact us at:

Klüber Lubrication NA LP – Summit  
Attn: Privacy  
9010 CR 2120  
Tyler, TX 03053

Phone: (903) 534-8021  
[privacy@us.kluber.com](mailto:privacy@us.kluber.com)

# **Cookie Policy**

## **ABOUT US**

The expression “we” where used in this Cookie Policy means Klüber Lubrication NA LP and the expressions “our” and “us” should be read accordingly.

## **INFORMATION ABOUT OUR USE OF COOKIES**

Our website uses cookies to distinguish you (or members of your household) from other users of our website. This helps us to provide you with the right experience when you visit our website and also allows us to improve our website.

### **About Cookies**

A cookie is a small file that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive. By continuing to browse the website, you are agreeing to our use of cookies and functionally similar technologies.

We may use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visits to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests or share this information with third parties for this purpose, as detailed in our Privacy Policy.

### **Analytics Providers**

Please note that third parties (including advertising networks and providers of external services like web traffic analysis services) may also use cookies over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies or similar technologies.

Please also note that we use Google Analytics, which places cookies on your computer, to help the website analyze how visitors use the website. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google for the purpose of evaluating your use of the website, compiling reports on website activity for website operators, and providing to us other services relating to website activity and internet usage. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of this website. Furthermore, you can prevent Google's collection and use of data (i.e. cookies and IP address) by downloading and installing the browser plug-in available [here](#). If you do not want to be tracked by Google Analytics cookies you can opt-out by installing a browser plug-in here: <https://tools.google.com/dlpage/gaoptout/>

[Click here](#) for further information on how Google uses your data.

### **Rejecting Cookies**

You may block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary cookies), you may not be able to access all or parts of our website.

Please consult the following links for information on cookie management and blocking according to your browser:

Explorer: <https://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>.

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Chrome: <https://support.google.com/chrome/answer/95647?hl=en>

Safari: [https://support.apple.com/kb/PH19214?locale=en\\_US](https://support.apple.com/kb/PH19214?locale=en_US)

Microsoft Edge: <https://support.microsoft.com/en-us/help/4027947/windows-delete-cookies>

## Further Information

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

COOKIE NAME	PROVIDER	TYPE	EXPIRY	KIND OF COOKIE	PURPOSE
csrftoken	klsummit.com	HTTP	Session	Necessary	Protection against Cross-Site Request Forgery (CSRF) attacks.
sessionid	klsummit.com	HTTP	Session	Necessary	Preserves user session state across page requests.
_utma	google-analytics.com	HTTP	2 years from set/update	Statistics	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.
_utmb	google-analytics.com	HTTP	30 minutes from set/update	Statistics	Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existing __utmb cookies exists. The cookie is updated every time data is sent to Google Analytics.

_utmz	google-analytics.com	HTTP	End of browser session	Statistics	Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with the __utmb cookie to determine whether the user was in a new session/visit.
_utmt	google-analytics.com	HTTP	10 minutes	Statistics	Used to throttle request rate.
_utmc	google-analytics.com	HTTP	6 months from set/update	Statistics	Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.

## Slavery and Human Trafficking Statement Pursuant to the California Transparency in Supply Chains Act

The California Transparency in Supply Chains Act of 2010 (the “Act”) requires large manufacturers who do business in the State of California and have gross worldwide sales of over \$100 Million Dollars to be transparent about their efforts to eradicate Slavery and Human Trafficking in their supply Chain. Within the meaning of the Act, Slavery and Human Trafficking concern the practice of utilizing forced or compulsory labor in any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. In accordance with the Act, this statement articulates our policies and practices around recognizing and preventing human trafficking and slavery in the global supply chain.

We are members of the United Nations Global Compact. As such, we adhere to Ten Principles (see <https://www.unglobalcompact.org/AboutTheGC/TheTenPrinciples/Principle4.html>) which individually and collectively address our commitment to human rights and the elimination of all forms of forced and compulsory labor. Our internal policies and practices, including our Guiding Principles and Business Principles (available at <https://www.freudenberg.com/company/responsibility/>) are based on such principles of international labor and human rights standards. Accordingly, we allow workers the right to freely choose employment, the right to associate freely, the right to voluntarily join or not join labor unions and bargain collectively, and the right to do so in a workplace free of harassment and unlawful discrimination. Likewise, we seek business partners that commit to observe such principles and human rights.

## **Verification**

We adhere to all state and federal employment and labor laws. Accordingly, we do not engage in the use of forced, bonded, indentured or involuntary labor and do not tolerate our suppliers engaging in such conduct. We do not employ third parties to verify supplier compliance. We verify supplier compliance by insisting on it as part and parcel of our Purchase Terms and Conditions (available at [https://www.klueber.com/ecomaXL/files/Purchase\\_terms\\_and\\_conditions\\_USA.pdf](https://www.klueber.com/ecomaXL/files/Purchase_terms_and_conditions_USA.pdf)).

## **Certification**

As part of our contracting process, we require suppliers to certify that neither they nor any of their subcontractors, vendors, agents or other associated third parties utilize child, slave, prisoner or any other form of forced or involuntary labor, or engage in abusive employment or corrupt business practices, in the supply of products to our company (Compliance with laws addendum, available at [https://www.klueber.com/ecomaXL/files/Purchase\\_terms\\_and\\_conditions\\_USA.pdf](https://www.klueber.com/ecomaXL/files/Purchase_terms_and_conditions_USA.pdf)).

## **Training**

We adhere to standards of responsible conduct and train employees to treat each other with respect, and to adhere to laws, regulations and standards. We maintain formal employment policies and standards under which there is no room for forced or compulsory labor in any work or service. Our policies and standards are monitored by the Human Resources department, which has discretion to discipline employees up to and including termination. We make available to employees and suppliers Q&A information (Appendix A hereto) which enables them to recognize forbidden conduct and encourages them to report it for appropriate corrective action.

## **Audit**

We are vigilant of any conduct that violates company policies or principles. We do not engage external auditors in connection with the California Transparency in Supply Chains Act. As part of our policies and standards, we encourage persons who witness offensive conduct to bring it to the attention of the offending party and to Human Resources. All reports of offensive conduct are investigated and subjected to appropriate corrective action.

## **Internal Accountability**

We rely on voluntary reports of non-compliance and take them seriously. In addition to relying on legally mandated posters which advise workers of their rights, employees are also informed of their right to lodge internal complaints without fear of retaliation. After investigation, non-compliance of any employment or labor standards can result in corrective action up to and including termination. Further, noncompliance by suppliers can result in termination of the relationship when a supplier that does not comply fails to commit to a specific plan to achieve compliance.

## **Appendix A - Q & A on Slavery and Human Trafficking: What Does it Mean and What to Do About it?**

There are numerous laws that forbid Slavery and Human Trafficking. As a signatory of the UN Global Compact, our company does not engage in Slavery and Human Trafficking and does not associate with suppliers that engage in such conduct. What does Slavery and Human Trafficking Mean in the Twenty-First Century? Slavery and Human Trafficking concern the practice of utilizing forced or compulsory labor in any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labor is not forced or compulsory. By right, labor should be

freely given and employees should be free to leave in accordance with established rules. While forced or compulsory labor can present itself in many forms, in our global manufacturing business, examples of conduct which may amount to forced or compulsory labor are:

- **Child labor** in particularly abusive conditions where the child has no choice about whether to work
- **Physical abduction or kidnapping**
- **Sale of a person** into the ownership of another
- **Physical confinement in the work location** (in prison or in private detention)
- The **work or service of prisoners** if they are hired to or placed at the disposal of private individuals, companies or associations involuntarily and without supervision of public authorities
- Requiring the **indefinite lodging of deposits, financial, or personal documents** as condition to employment
- **Destroying, confiscating or denying** access to an employee's identity documents, such as passports or drivers' licenses
- Charging employees (as opposed to employers) **recruitment fees** as a condition for securing employment
- **Physical or psychological (including sexual) violence** as a means of keeping someone in forced labor (direct or as a threat against worker, family, or close associates)
- Full or partial **restrictions on freedom of movement**
- **Withholding and non-payment of wages** (linked to manipulated debt payments, exploitation, and other forms of extortion)
- **Deprivation of food, shelter or other necessities**
- **Deception or false promises** about terms and types of work
- **Induced indebtedness** (by falsification of accounts, charging inflated prices, reduced value of goods or services produced, excessive interest charges, etc.), and
- **Threats to denounce** workers in an irregular situation to the authorities

Associates, contractors, and suppliers aware of any such conduct should report it to HR or the Legal Department. Consistent with company policy, the company forbids retaliation against any employee who reports or assists in an investigation of unlawful conduct, including Slavery and Human Trafficking. Employees who believe they have been the subject of retaliation should follow the company's internal complaint mechanism for reporting retaliation.