



BRIGHT MINDS,
BRIGHT LIGHTS.

PRIVACY POLICY

Last Updated: July 13th, 2020

ZKW Lighting Systems USA, Inc. (“ZKW”, “we”, “us”) is part of a global company that specializes in supplying premium, innovative lighting systems to the automotive industry.

Protecting the personal information of consumers is of special importance to us. This Privacy Policy (“Policy”) is intended to provide our customers and consumers in the United States with an understanding of our privacy practices, including our collection, use, and disclosure of personal information. This Policy applies to personal information about consumers collected by ZKW both online and offline. We collect personal information online via our website (zkw-group.com and zkw-group.com/en), email, social media accounts, and whistleblowing portal. We collect personal information offline via mail, telephone, and in person. This Policy does not apply to information we collect from job applicants, employees, or vendors.

1) Collection of Personal Information

The personal information we collect includes, but is not limited to:

- First and last name;
- Email address;
- Postal address;
- IP address;
- Telephone number;
- User ID and password;
- Account security questions and answers;
- Bank account information; and
- Credit or payment card information.

2) Purposes for Collecting Personal Information

We collect personal information for various purposes which include, but are not limited to:

- Fulfilling contracts and providing our products and services;
- Processing customer payments for our products and services;
- Communicating with our customers;
- Providing our customers with news including information about new products and events;
- Responding to communications from prospective customers via our website, email, or our social media accounts;
- Processing submissions made via our whistleblowing portal;
- Analyzing and improving our marketing efforts; and
- Maintaining and improving our information security and the operation of our website.

3) Disclosure of Personal Information

We disclose personal information to third parties so that they may help us provide our products and services. Such third parties include our IT providers, marketing partners, logistics partners, legal and audit professionals, banks and payment processors, and other service providers. We may also disclose personal information when required by law, subpoena, or other legal process or enforceable governmental request; to establish, exercise, or defend any legal claims; to investigate, take action, or prevent illegal activities, fraud, or potential threats to safety; or if our company or our assets are acquired or purchased by another company.



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ZKW does not sell personal information.

4) Children's Privacy

ZKW's services and website are not intended for children and we do not knowingly collect the personal information of individuals under the age of 16.

5) Cookies

Like most websites, we use cookies for technical and statistical purposes and for external media (Facebook, Google Maps, Twitter and YouTube), in order to improve usage of our website by you, with your consent. You can give your consent by clicking on "Accept all" in the cookie banner that is displayed on our home page when you first visit our site, or you can select individual cookies and then click on "Save".

If you want to change your cookie settings afterwards, please delete your cookies in your web browser so that the cookie banner appears again. Additional information about the cookies our site uses is available through the cookie banner.

We use Google Analytics, a web analysis service provided by Google Inc. ("Google"). Google Analytics uses so called cookies, text files that are stored on your computer, enabling your use of the website to be analyzed. As a rule, the information generated by cookies regarding your use of the website is transferred to and stored on a server in the USA that is operated by Google.

The following information will be collected by Google Analytics: source (country and city), language, operating system, device (PC, tablet PC or smartphone), browser and all add-ons used, screen resolution (on mobile device), source of visitor (Facebook, search engine or referring website), which files were downloaded, which videos were viewed, were any banners clicked on, where did the visitor go to, pages visited on the website, duration of visit on the website.

Additionally, your IP address will be captured, but pseudonymized immediately by deleting the last 8 bits. Accordingly, only a rough determination of the locality will be possible. No connection will be established between the IP address sent by your browser within the scope of Google Analytics and any other Google data.

You can prevent the storage of cookies through a corresponding setting in your browser software; please note, however, that in this case you may not be able to use all functions of this website to their full extent. You can also prevent Google from collecting and processing the data relating to your use of the website and generated by the cookie by simply downloading and installing the following browser plug-in by clicking on the following link: <http://tools.google.com/dlpage/gaoptout?hl=de>

6) Use of Google reCAPTCHA

We also use Google's "reCAPTCHA" tool to prevent spam and data abuse and to protect the website from bots. The mode of operation is based on advanced risk analysis technology in order to separate humans from bots. We use this tool in particular to protect forms.

The information recorded by cookies with regard to your use of this website (including your IP address) will be transmitted to and stored by Google servers (usually in the USA or in other countries outside the EU).

In particular the following information is being collected by Google reCAPTCHA: browser, browser history, type of device, model of device, country, service provider, access date, CSS information, duration of visit, behavior



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and clicks on the website, language, operating system, Google cookies already installed, other Google Account details, plug-ins, JavaScript objects.

For more information on Google reCAPTCHA, please refer to <https://developers.google.com/recaptcha/>

7) Do Not Track Signals

Some internet browsers have “Do Not Track” or “DNT” features which, when turned on, send a signal to the website that the individual visiting the website does not wish to be tracked. This website ~~does~~ responds to DNT signals. ZKW does not track your online activities over time and across third party websites. However, other third parties may be conducting online tracking on our websites.

8) Third Party Links

Links to third party websites are provided on our website for your convenience. ZKW exercises no control over such other websites and is not responsible for the content thereon. This Policy does not apply to third party websites, and we recommend that you review the online privacy policy of any website you visit to determine how the operator of that website handles personal information collected through its website.

9) Data Security

We take reasonable measures that we believe are appropriate to protect your information from loss, misuse, alteration or destruction. We will ask any agents and service providers to whom we may transfer your information to take comparable steps to protect that security.

10) Access and Correction

If you would like to request access to personal information that we have collected about you or if you believe information we have collected is inaccurate and you would like to request that we correct that information, please contact us at: office@zkwusa.com.

11) California Residents: Your Rights

California residents (“you” or “your” for purposes of this section) have specific rights regarding your personal information (“personal information” or “PI”) under the California Consumer Privacy Act (CCPA). This section describes your CCPA rights and explains how to exercise them. Please note that the CCPA does not apply to certain information and our processing of those categories of information is not addressed below.

Categories of Personal Information Collected, Disclosed, or Sold in the Last Twelve (12) Months

You have the right to know the categories of personal information ZKW has collected, disclosed, or sold about its consumers within the last twelve (12) months. The chart below offers a comprehensive overview of the types of personal information we collect, with whom it is shared, and for what purposes.



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Category	Examples	Collected	Source	Purpose of Collection	Third Parties to Whom Disclosed
A. Identifiers.	A real name, postal address, unique personal identifier, online identifier, IP address, email address, account name, telephone number.	YES	Customers, third parties	<p>To provide our products and services.</p> <p>To process customer payments.</p> <p>To communicate with customers and prospective customers.</p> <p>To process submissions made via our whistleblowing portal.</p> <p>To analyze and improve our marketing efforts.</p> <p>To maintain and improve our information security and the operation of our website.</p>	<p>IT service providers.</p> <p>Marketing service providers.</p> <p>Logistics service providers.</p> <p>Banking and payment service providers.</p>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, bank account number, credit card number, or any other financial information.	YES	Customers, third parties	<p>To provide our products and services.</p> <p>To process customer payments.</p> <p>To communicate with customers and prospective customers.</p> <p>To process submissions made via our whistleblowing portal.</p> <p>To analyze and improve our marketing efforts.</p> <p>To maintain and improve our information security and the operation of our website.</p>	<p>IT service providers.</p> <p>Marketing service providers.</p> <p>Logistics service providers.</p> <p>Banking and payment service providers.</p>



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C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, national origin, citizenship.	YES	Customers, third parties	To provide our products and services. To process customer payments. To communicate with customers and prospective customers. To analyze and improve our marketing efforts.	IT service providers. Marketing service providers. Logistics service providers. Banking and payment service providers.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	Customers, third parties	To provide our products and services. To process customer payments. To communicate with customers and prospective customers. To analyze and improve our marketing efforts.	IT service providers. Marketing service providers. Logistics service providers. Banking and payment service providers.
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO			
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's	YES	Consumers, third party data analytics providers	To improve our website and marketing efforts. Fraud prevention	Third party marketing service provider.



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	interaction with a website, application, or advertisement.				
G. Geolocation data.	Physical location or movements.	NO			
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO			
I. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO			
J. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO			

Right to Know About Personal Information Collected, Disclosed, or Sold

You have the right to request that ZKW discloses certain information to you about our collection, use, disclosure and sale of your personal information over the past twelve (12) months. Once we receive and confirm your request, to the extent you have requested them, we will disclose to you:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information was collected;
- Our business or commercial purpose for collecting that personal information;
- The categories of third parties with whom we shared that personal information, if any;
- The specific pieces of personal information we have collected about you (also called a data portability request); and/or
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained; and



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- Sales, identifying the personal information categories that each category of recipient purchased. **ZKW does not sell personal information.**

Right to Request Deletion of Personal Information

You have the right to request that ZKW delete any of the personal information that we have collected from you and maintain, subject to certain exceptions. Once we receive and confirm your request, we will either delete, de-identify, or aggregate your personal information, unless not doing so is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, take actions reasonably anticipated within the context of our business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- 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 the our deletion of the information is likely to render impossible or seriously impair the achievement of such research, if the you have previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Rights to Know and Deletion

To exercise your rights, please submit a request by email or telephone using the contact information provided below in this policy. In order to submit a consumer request, a consumer must provide unique identification information that matches information we hold (e.g., name, billing information or transaction number).

Only you, or someone legally authorized to act on your behalf (i.e., your authorized agent), may make a request related to your personal information. ZKW may require an agent to provide verification that they are acting on your behalf when they submit a request related to your personal information.

Non-Discrimination

ZKW will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you services;
- Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of services; or
- Suggest that you may receive a different price or rate for services or a different level or quality of



services.

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12) Changes to this Policy

As the Internet evolves, we will continuously adjust these data protection provisions. Any changes will be posted on the website. Therefore, you should call up this Privacy Policy regularly, in order to bring yourself up to date.

13) Contact

If you have any questions or comments about this Privacy Policy, the ways in which ZKW collects and uses your information, your rights regarding such use, or wish to exercise your rights provided under this Policy or California law, please contact the Global Data Protection Officer at:

Attn: Stefan Heinrich

Email: datenschutz@zkw-group.com

Postal Address: Rottenhauser Str. 8, 3250 Wieselburg