



CIRCOR Mobile App Privacy Policy

Last modified: December 15, 2020

I. Introduction

CIRCOR International, Inc. ("**Company**" or "**CIRCOR**" or "**We**") respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes:

- The types of information we may collect or that you may provide when you download, install, register with, access, or use the CIRCOR mobile app (the "**App**").
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies only to information we collect in this App and in email, text, and other electronic communications sent through or in connection with this App.

This policy DOES NOT apply to information that:

- We collect offline or on any other Company apps or websites, including websites you may access through this App.
- You provide to or is collected by any third party (see [Third-Party Information Collection](#)).

Our websites and apps, and these other third parties have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not download, register with, or use this App. By downloading, registering with, or using this App, you agree to this privacy policy.

This policy may change from time to time (see [Changes to Our Privacy Policy](#)). Your continued use of this App after we revise this policy means you accept those changes, so please check the policy periodically for updates.

II. Information We Collect and How We Collect It

We collect information from and about users of our App:

- Directly from you when you provide it to us.
- Automatically when you use the App.

When you download, register with, or use this App, we may ask you provide information:



- By which you may be personally identified, such as name, postal address, email address, telephone number, or any other identifier by which you may be contacted online or offline ("**personal information**").

This information includes:

- Information that you provide by filling in forms in the App. This includes information provided at the time of registering to use the App, subscribing to any services, posting material, and/or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the App.
 - Records and copies of your correspondence (including email addresses and phone numbers), if you contact us.
 - Your responses to surveys that we might ask you to complete for research purposes.
 - Details of transactions you carry out through the App and of the fulfillment of your orders. You may be required to provide financial information before placing an order through the App.
 - Your search queries on the App.
 - We may request access or permission to certain features from your mobile device, including your mobile device's camera and other features. If you wish to change our access or permissions, you may do so in your device's settings.
 - We may request to send you push notifications regarding your account or the App. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
- ***Note on Sensitive Personal Data***

Before collecting any sensitive data, we will inform you and ask your explicit consent in accordance with article 9.2.a. of Regulation (EU) 2016/679. Other than provided above, we ask you not to send or disclose any sensitive personal data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religious, philosophical or other beliefs, health, sex life or sexual orientation, biometrics or genetic characteristics, criminal background or trade union membership) to us, on or through the App, or by any other means.

- ***Note on Customer support***

When you require customer support, we may ask you to provide us with information related to your use of the App, including your interaction with CIRCOR, and how to contact you so we can provide the required support. We also use your information to respond to you when you contact us.

We consider the processing of your Customer Support data to be necessary for the performance of a contract to which you are party and lawful under Article 6.1.(b) of Regulation (EU) 2016/679. In some cases, we consider the processing of your Customer Support Data to be based



on a legitimate interest of CIRCOR and lawful under Article 6.1. (f) of Regulation (EU) 2016/679.

III. Children Under the Age of 16

The App is not intended for children under 16 years of age, and we do not knowingly collect personal information from children under 16. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at privacy@circor.com

California residents under 16 years of age may have additional rights regarding the collection and sale of their personal information. Please see [Your California Privacy Rights](#) for more information.

IV. Automatic Information Collection and Tracking

When you download, access, and use the App, it may use technology to automatically collect:

- **Usage Details.** When you access and use the App, we may automatically collect certain details of your access to and use of the App, including traffic data, location data, logs, and other communication data and the resources that you access and use on or through the App.
- **Device Information.** We may collect information about your mobile device and internet connection, including the device's unique device identifier, IP address, operating system, browser type, mobile network information, and the device's telephone number.
- **Stored Information and Files.** The App also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- **Location Information.** This App may collect real-time information about the location of your device.

If you do not want us to collect this information you may opt out at any time by disabling location services for the app. Note, however, that opting out of the App's collection of location information will disable its location-based features.



V. Information Collection and Tracking Technologies

The technologies we use for automatic information collection may include:

- **Cookies (or mobile cookies).** A cookie is a small file placed on your smartphone. It may be possible to refuse to accept mobile cookies by activating the appropriate setting on your smartphone. However, if you select this setting you may be unable to access certain parts of our App.
- **Web Beacons.** Pages of the App may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages [or opened an email] and for other related app statistics (for example, recording the popularity of certain app content and verifying system and server integrity).

VI. Third-Party Information Collection

When you use the App or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

These third parties may use tracking technologies to collect information about you when you use this app. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps, and other online services websites]. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. [For information about how you can opt out of receiving targeted advertising from many providers, see [Your Choices About Our Collection, Use, and Disclosure of Your Information](#).

VII. How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information, to:

- Provide you with the App and its contents, and any other information, products or services that you request from us.
- Fulfill any other purpose for which you provide it.



- Carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- Notify you when App updates are available, and of changes to any products or services we offer or provide though it.

The usage information we collect helps us to improve our App and to deliver a better and more personalized experience by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our App according to your individual interests.
- Speed up your searches.
- Recognize you when you use the App.

We use location information we collect to identify proper channels for service and sales.

We consider this processing of data as described above to be necessary for the performance of a contract to which you are party and lawful under Article 6.1. (b) of Regulation (EU) 2016/679.

VIII. Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual or device, without restriction.

In addition, we may disclose personal information that we collect or you provide:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business[and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them].
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of CIRCOR's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by CIRCOR about our App users is among the assets transferred.
- To third parties to market their products or services to you if you have consented to/not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it. For example, if you give us an email address to use an "email a friend" feature of our Website or App, we will transmit the contents of that email and your email address to the recipients.
- For any other purpose disclosed by us when you provide the information.
- With your consent.



- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce our rights arising from any contracts entered into between you and us, including the App EULA, and for billing and collection.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of CIRCOR, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

IX. Your Choices About Our Collection, Use, and Disclosure of Your Information

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of over your information.

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies or block the use of other tracking technologies, some parts of the App may then be inaccessible or not function properly.
- **Location Information.** You can choose whether or not to allow the App to collect and use real-time information about your device's location through the device's privacy settings or through the selection in the App. If you block the use of location information, some parts of the App may become inaccessible or not function properly.
- **Promotion by the Company.** If you do not want us to use your contact information to promote our own or third parties' products or services, you can opt-out by logging into the App and adjusting your user preferences in your account profile by sending us an email stating your request to privacy@circor.com
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can adjust your user advertising preferences in your account profile by sending us an email stating your request to privacy@circor.com.
- **Disclosure of Your Information for Third-Party Advertising and Marketing.** If you do not want us to share your personal information with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt-out by sending us an email stating your request to privacy@circor.com.
- We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.



California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

X. Your choices and rights regarding access, erasure and other actions regarding your data

If you would like to submit a request to access, rectify, erase, restrict or object to the processing of personal data that you have previously provided to us, or if you would like to submit a request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us at privacy@circor.com. We will respond to your request consistent with applicable law.

In your request, please make clear what personal data you would like to access, rectify, erase, restrict or object to its processing. For your protection, we may only implement requests with respect to the personal data associated with your account, your email address or other account information, that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

We cannot delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Where we rely on consent to collect and/or process your personal data, you may withdraw your consent at any time, without affecting the lawfulness of processing based on consent before your withdrawal. Where we rely on performance of a contract to process your personal data, we may not be able to provide the services under the contract if we do not receive your information. Please note that if you make use of (some of) your choices and rights, you may not be able to use, in whole or in part, our App anymore.

When we process your personal data based on a legal obligation to which we are subject, including when you interact with us to exercise any of your rights, we consider the processing to be lawful in accordance with Article 6.1.(c) of Regulation (EU) 2016/679.

[If you delete your User Contributions from the App, copies of your User Contributions may remain viewable in cached and archived pages, or might have been copied or stored by other App users. Proper access and use of information provided on the App, including User Contributions, is governed by our terms of use [\[LINK TO TERMS OF USE\]](#).]

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) for more information.

XI. Cross-border transfer

Your personal data may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the App, you acknowledge the transfer (if any) of information to countries outside of your country of residence, which may have data protection



rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your personal data.

If you are located in the European Economic Area (EEA), your personal data may be transferred to our affiliates or service providers in non-EEA countries that are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here (https://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)). For transfers from the EEA to countries not considered adequate by the European Commission, such as the United States, we have put in place adequate measures and/or standard contractual clauses adopted by the European Commission to protect your personal data. You may obtain a copy of these measures by contacting us at privacy@circor.com.

XII. How long do we keep your data?

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which the data is collected. The criteria we use to determine our retention periods include: (i) the length of time you use the App; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

XIII. Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit [this link](#).

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our App that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to privacy@circor.com.

XIV. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions and OTHER INFORMATION will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our App, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We



urge you to be careful about giving out information in public areas of the App like message boards. The information you share in public areas may be viewed by any user of the App. Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our App. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

XV. Changes to Our Privacy Policy

We reserve the right to amend or update this Privacy Notice from time to time. When we update this Privacy Notice, we will also update the date at the top of this Privacy Notice.

We encourage you to review regularly the latest version of this Privacy Notice.

The new Privacy Notice will become effective immediately upon publication. If you do not agree to the revised notice, you should alter your preferences, or consider stop using our App. By continuing to access or make use of our App after those changes become effective, you acknowledge that you have been informed and agree to the Privacy Notice as amended. changes.

XVI. Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at: privacy@circor.com