



DATA PRIVACY POLICY

Kesseltronics Systems, a Division of Dover Canada Operations ULC (“Kesseltronics”) is committed to protecting the information that our customers, business partners, and others have entrusted to us. Kesseltronics must collect and use personal data in order to perform our business functions, produce best-in-class products, and be a market leader. Consistent with our Kesseltronics Values, we treat any personal data that we obtain with respect and in accordance with the various, applicable data privacy laws around the globe.

This Data Privacy Policy (“Policy”) sets forth the principles that govern our treatment of personal data.

Any changes we make to our Policy in the future will be posted on this page, and where appropriate, notified to the concerned persons.

By using a Kesseltronics application we associate with this Policy, or by choosing to submit personal information to Kesseltronics, you signify your consent to all of the terms of this Policy. If you do not agree with any terms of this Privacy Policy, please do not use our applications or submit any personal information to Kesseltronics.

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INTRODUCTION

1.1 What is data privacy?

Data privacy is the practice of only using as much personal data as is necessary to complete a business objective, limiting access to that data to only those who need it to complete the objective, and protecting that data from unauthorized use.

1.2 What is personal data?

Personal data is any information that, standing alone or in connection with other data, could be used to identify the individual to whom the information relates. Personal data includes your name, contact information and payment information. Even data that uses a unique identifier instead of a name (for example, an IP address or email address) is personal data if that unique identifier can be tied to an

individual. In this policy, the terms “personal data” and “personal information” are used interchangeably.

1.3 What types of personal data does Kesseltronics collect or use and for what purpose?

Kesseltronics receives and uses a wide range of personal data in order to conduct our day-to-day business activities and to fulfill our obligations as required by law. Some examples include:

- a) Contact details for key personnel at customers and potential customers for the purpose of administering sales, service, and marketing; including online data collected through Kesseltronics’ websites and social media sites;
- b) When you use our CarWash application, we may collect your first and last name, postal code, email address, and information regarding your use of the application, such as your redemption of car washes and the number you have remaining, to allow you to create and assess your account, and to provide the CarWash application in accordance with its terms of use.
- c) If you use the CarWash application to make a purchase, your payment information is processed by the Stripe payment processing platform to pay for your purchase.
- d) Contact details for personnel of vendors and suppliers for the management of the relationship.

We do not knowingly collect or allow the collection of Personal Information from persons under the age of 18. If you are the parent or legal guardian of a minor who has provided us with Personal Information, you may contact us using the contact information provided below for the purpose of requesting this information be deleted.

2. OUR GUIDING PRIVACY PRINCIPLES

2.1 Data Minimization and Limited Use

Kesseltronics limits the data that it collects and uses. Kesseltronics collects, uses, and stores personal data in accordance with its legal obligations. This means that we aim to only collect or use personal data that is relevant to a specific and identified purpose to which you have consented or when permitted or required by applicable law (collectively referred to in this Privacy Policy as a “legitimate business purpose”). In other words, Kesseltronics does not wish to collect, use, or store personal data in excess of what is minimally required by law or for the legitimate business purpose for which that information is being obtained or used.

Those granted access to personal information by Kesseltronics may not use that information for their own interest.

Example: Kesseltronics’ CarWash application requires users to login with an email address that is authorized by Google’s Firebase platform, and only the email address used for the login will be stored on the server.

2.2 Data Security

<p>The Principle: Kesseltronics protects personal data through physical and technical security measures tailored to the sensitivity of personal data we hold.</p>
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Kesseltronics aims to secure the personal data we hold. We employ IT security tools, restrictions on access to the data, and physical and organizational security measures to help prevent unauthorized or unlawful access to personal data and accidental loss, destruction, or damage to personal data. Personal data may be accessed by persons within our organization, or our third party service providers, who require such access to carry out the purposes described in this Policy, or such other purposes as may be permitted or required by the applicable law. Personal Information we collect is primarily maintained on servers located in Ashburn, Chantilly, Manassas or Sterling, Virginia.

Kesseltronics regularly evaluates the protections that we have in place for such data in order to ensure that our security measures are tailored to the appropriate sensitivity level. However, no security measures can provide absolute protection. We cannot ensure or warrant the security of any information you provide to us.

2.3 Transparency

The Principle: Kesseltronics communicates with our employees, customers, suppliers, business partners, and others about how we intend to use personal data in our day-to-day operations.

Kesseltronics provides notice in accordance with local law. Our objective is to provide information to our customers and other key constituencies about how we intend to use personal data to conduct our business. Notice may be provided before or at the time of collecting personal data, or as permitted by applicable law, as soon thereafter as possible.

Consent of the data subject may be required before processing personal data. Employees handling sensitive personal data may not do so unless the proper protections are in place. Where consent is required, we will not process your personal data unless your consent is given.

Example: This Privacy Policy informs you of how we collect, process and use your personal data.

2.4 Data Quality, Integrity, and how to Access and Correct your Personal Data

The Principle: Kesseltronics takes reasonable steps to ensure our personal data is accurate and up-to-date, and we also provide data subjects with the right to access and correct their personal data.

Like the individuals who share their personal data with us, Kesseltronics has an interest in ensuring that the data we maintain is correct.

Customers, suppliers, business partners, and others are encouraged to notify Kesseltronics of changes in their personal information so that our records remain accurate. Customers are responsible for updating or correcting their own personal data.

Kesseltronics provides you with the ability to access and request correction of your own personal data. Customers, suppliers, business partners, and others should submit an access or rectification request in writing, providing proof of their identity to privacyinfo@kesseltronics.com.

Example: Customers, suppliers, business partners and others can submit requests to have their personal data corrected or updated to privacyinfo@kesseltronics.com.

2.5 Data Retention and Disposal

The Principle: Kesseltronics will only keep personal data as long as required by the Kesseltronics Records Management Policy, and according to the applicable laws and dispose of it securely.

Kesseltronics adheres to its Records Management Policy to determine how long we retain data, including personal data. The retention periods are established considering Kesseltronics' legitimate business purposes, and according to the local regulations.

3. COMPLIANCE WITH APPLICABLE LAWS, RULES, AND REGULATIONS

3.1 Disclosure to Third Parties

At times, Kesseltronics engages third party contractors, subcontractors, service providers, and other vendors to help us accomplish our business objectives, and to carry out the legitimate business purposes described in this Policy. If the engagement involves the transmission of personal data, Kesseltronics requires the service provider to treat that data consistent with this Policy.

If you use Kesseltronics' CarWash application, we disclose information to the car wash operator regarding your use of the application, such as your redemption of car washes and the number you have remaining, location of use and email address to permit the application to function in accordance with its terms of use.

In certain circumstances, Kesseltronics may disclose personal information when required by law, when required to protect Kesseltronics's legal rights, or in an emergency situation where the health or security of an individual is endangered. Kesseltronics may also disclose personal data in the context of any sale or transaction involving all or a portion of the business.

3.2 We Transfer Personal Information Internationally

Many countries have laws and regulations restricting the international transfer of personal information – even if those transfers are between two companies of the same corporate group. Where restrictions exist, Kesseltronics may transfer personal information outside the country where the information is collected only if the destination country has data protection laws that provide an adequate level of protection or a legal mechanism is used (e.g., EU standard contract clauses are in place between the two entities or the transfer is otherwise allowed by statute).

Kesseltronics transfers personal information across borders in accordance with applicable laws. This includes situations where Kesseltronics is dealing with service providers or third parties based in another country and transferring personal information to them or allowing them to remotely access Kesseltronics's systems/data.

For residents of Canada, you expressly agree that we may transfer personal data outside of Canada. For example, some or all of the Personal Information we collect may be stored or processed on servers located outside of Canada, including in the United States, whose data protection laws may differ from those of Canada. As a result, this information may be subject to access requests from governments, courts, or law enforcement in those jurisdictions according to laws in those jurisdictions.

3.3 Data Breach Notification

Kesseltronics makes reasonable efforts to notify individuals and regulatory authorities, as required by law, if we reasonably believe that personal information has been stolen, disclosed, altered, or infringed by an unauthorized person.

If you become aware of or suspect a breach or an attempted breach, contact Kesseltronics immediately at privacyinfo@kesseltronics.com and provide the team with the information they will require to properly investigate and respond.

4. QUESTIONS

Customers, suppliers, business partners, and others should direct their questions regarding this Policy to:

Kesseltronics Systems

- privacyinfo@kesseltronics.com, or
- Assistant General Manager; 5212 Harwood Blvd., Vaudreuil-Dorion, Quebec J7V 0K2, Canada

Dover Corporation

- Legal Services Manager; 3005 Highland Parkway, Downers Grover, IL 60515, U.S.A.