



# Swagelok Privacy and Data Protection Policy

## Swagelok Privacy and Data Protection Policy

Last updated April 25, 2018

### **SWAGELOK'S COMMITMENT TO PRIVACY**

Swagelok Company, its subsidiaries and its authorized sales and service centers (collectively, "Swagelok" or "we," "us," or "our") respect your right to privacy and are committed to protecting your information and/or data. This policy (the "Policy") summarizes what information we may collect through [Swagelok.com](https://www.swagelok.com)® and any authorized sales and service center website (collectively, the "Sites"), how the information may be used, with whom it may be shared, and other important topics relating to your privacy and data protection.

**Please read this Policy carefully, because by using the Sites, you are acknowledging that you understand and agree to the terms of this Policy.** In addition, please review the [Terms and Conditions of Use](#), which govern your use of the Sites and any content you submit to the Sites.

#### **1. SWAGELOK'S PRIVACY SHIELD PARTICIPATION AND COMMITMENT**

Swagelok complies with the EU-U.S. Privacy Shield Framework and the Swiss – U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States, respectively. Swagelok has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

Swagelok's participation in the Privacy Shield applies to all Personal Information (as defined below) that is subject to this Policy and is received from the European Union, European Economic Area, and Switzerland. Swagelok will comply with the Privacy Shield Principles in respect of such personal data.

Swagelok's accountability for Personal Information that it receives under the Privacy Shield and subsequently transfers to a third party is described in the Privacy Shield Principles. In particular, Swagelok remains responsible and liable under the Privacy Shield Principles if third-party agents that it engages to process the personal data on its behalf do so in a manner inconsistent with the Principles, unless Swagelok proves that it is not responsible for the event giving rise to the damage.

As further explained in the "How to Contact Us" section of this Policy, we encourage you to contact us should you have a Privacy Shield-related (or general privacy-related) complaint. For any complaints that cannot be resolved with Swagelok directly, Swagelok has chosen to cooperate with EU data protection authorities ("DPA") and comply with the information and advice provided to it by an informal panel of DPAs in relation to such unresolved complaints (as further described in the Privacy Shield Principles). Swagelok is subject to the investigatory and enforcement powers of the U.S. Federal Trade Commission ("FTC"). Swagelok is also committed to cooperating and complying with the Swiss Federal Data Protection and Information Commissioner.

Please find further information from the DPAs at [http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm).

Under certain conditions, more fully described on the Privacy Shield website (<https://www.privacyshield.gov>), you may invoke binding arbitration when other dispute resolution procedures have been exhausted.

## 2. USE AND COLLECTION OF INFORMATION

### Use of Cookies and Similar Technologies

Like most companies, Swagelok uses cookies and similar tools ("cookies") on the Sites to facilitate and improve your online experience. Please review the [Swagelok.com® Cookie Notice and Disclosure](#), which explains how we do that.

### Information You Provide To Us

Generally you can visit the Sites without providing personal data, unless otherwise mentioned in the Sites themselves. For instance, at [Swagelok.com](#), you may register with an authorized sales and service center, which enables you to place orders electronically with your selected authorized sales and service center. If you choose to register and place an order, you will be asked to provide certain personal data, including your name, e-mail address, company name, telephone number, job title, market, billing and shipping information ("Personal Information").

The collection, processing and the use of Personal Information collected during registration with your authorized sales and service center requires your consent. The consent may be declared electronically. You may withdraw your consent at any time by sending an e-mail to [infosec@swagelok.com](mailto:infosec@swagelok.com) or write to us at Swagelok Company, Data Privacy Officer, 6262 Cochran Road, Solon, Ohio 44139 USA.

In addition, if you choose to communicate with us by e-mail or otherwise complete on-line forms or other documents, this information may also be collected in your profile. Moreover, if you choose to use the "forward to a friend" function, or link to referenced documents or sources, this information is used to analyze site usage metrics.

### Information We Collect Automatically

We (and third party service providers acting on our behalf) use cookies and other tools (such as web analytic tools and pixel tags) to automatically collect information about you when you use the Sites, subject to the terms of this Policy and applicable data laws and regulations. The types of information collected automatically may include:

- information about the type of browser you use;
- details of the web pages you have viewed;
- your IP address; and
- the hyperlinks you have clicked.

We use this data to determine the general physical location of your computer or device and understand what regions of the world our visitors to the Sites are coming from. We also may use this Personal Data to enhance the Sites.

## Use and Collection of Personal Information

The following persons or entities may have access to the Personal Information that you provide to Swagelok: Swagelok, and its employees, and Swagelok authorized sales and service centers and their respective employees. We will take reasonable care to protect data and limit access only to Swagelok employees or Swagelok authorized sales and service center employees who have a legitimate business reason to view the Personal Information. All parties who have access to your Personal Information are required to keep it confidential and may not use it for any purpose other than to provide you services within the normal business activities of Swagelok and its authorized sales and service centers. Such normal business activities may include, for example:

- communicating with you about your account, products, services, events, surveys and promotions by Swagelok (including by sending you marketing communications);
- sending you samples, products and information;
- processing payment for products or services purchased by you;
- processing payment for products or services sold by you to Swagelok;
- providing you with access to certain areas and features of the Sites;
- verifying your identity to ensure security for the other purposes listed here;
- processing, evaluating and responding to your requests, inquiries and applications; and
- for purposes disclosed at the time you provide your Personal Information or otherwise with your consent.

### 3. SHARING AND TRANSFERRING OF YOUR PERSONAL INFORMATION

We will keep your Personal Information private and will not disclose it to other parties, unless such disclosure is necessary to: (a) comply with any federal or state law, a court order or other legal process; (b) prevent physical harm or financial loss, or in connection with an investigation of suspected or actual illegal activity; (c) enforce any of our Terms and Conditions of Use; (d) enable service providers we may have retained to perform services on our behalf; or (e) enable other Swagelok group companies performing services on our behalf. We also reserve the right to transfer Personal Information in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation). However, we may share non-Personal Information, such as aggregate user statistics, demographic data, and usage data with third parties. When sharing any Personal Information with a third party, Swagelok will require that party to use and protect your Personal Information in a manner that is consistent with this Policy.

In the event that we transfer the Personal Information collected to other countries where we do business, we will do so only for the purposes described herein. When any Personal Information is transferred, it will be protected as stated in this Policy.

### 4. CHOICE AND ACCESS

We will give notice to you regarding the types of third parties to which we disclose any Personal Information, and provide choice regarding the types of Personal Information we disclose. You can choose to opt-out of having Personal Information stored in our systems at any time by sending an e-mail to [infosec@swagelok.com](mailto:infosec@swagelok.com) or by writing us at Swagelok Company, Data Privacy Officer, 6262 Cochran Road, Solon, Ohio 44139 USA. Except as may be provided otherwise in this Policy, unless otherwise authorized by the individual, Swagelok will not disclose Personal Information to a third party. For sensitive Personal information, we will provide an affirmative or explicit (opt in) choice if: (i) the personal information is to be disclosed to a third party; (ii) used for a purpose other than those for which it was originally collected; or (iii) subsequently authorized by the individual through the exercise of opt in choice. You can request a copy of the Personal Information that Swagelok has collected about you at any time by sending an e-mail to [infosec@swagelok.com](mailto:infosec@swagelok.com) or by writing us at Swagelok Company, Data Privacy Officer, 6262 Cochran Road, Solon, Ohio 44139 USA. You can also have factual inaccuracies in this information corrected, or request that your Personal Information be removed, by contacting us. We are under no obligation to store Personal Information indefinitely and disclaim any liability arising out of, or related to, the destruction of Personal Information.

### 5. HOW WE PROTECT YOUR PERSONAL INFORMATION

**Security**

Swagelok takes reasonable and appropriate precautions to protect Personal Information from loss, misuse and unauthorized access, disclosure, alteration and destruction.

**Data Integrity**

Swagelok uses Personal Information only for the purposes for which it was collected or subsequently authorized by the individual. Swagelok takes reasonable steps to ensure that the Personal Information the company processes are (i) relevant for the purposes for which they are to be used, (ii) reliable for their intended use, and (iii) accurate, complete and current.

**Verification**

Swagelok uses a self-assessment approach to ensure compliance with this Policy. This includes a periodic assessment to verify the Policy is accurate and being adhered to. If you have concerns, please contact us and Swagelok will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information.

**6. CHILDREN'S PRIVACY**

The Sites are not directed to children under the age of thirteen (13) and we do not knowingly collect Personal Information from children under the age of thirteen (13) on the Sites. If we become aware that we have inadvertently received Personal Information from a visitor under the age of 13 on the Sites, we will delete the information from our records.

**7. CHANGES TO THE PRIVACY, DATA PROTECTION AND COOKIES POLICY**

This Policy may be updated periodically and without prior notice to you to reflect changes in our information practices. We will post a prominent notice on [Swagelok.com](https://www.swagelok.com) to notify you of any significant changes to our Policy and indicate at the top of the Policy when it was most recently updated.

**8. LINKS TO OTHER SITES**

The Sites may contain links to other websites for your convenience and information. We are not responsible for the privacy practices or the content of linked websites. Please refer to the privacy policies of those third-party websites.

**9. HOW TO CONTACT US**

If you have any questions or comments about this Policy, please contact us by:

Writing to:

Data Privacy Officer

Swagelok Company

6262 Cochran Road Solon, Ohio 44139 USA

or

Via e-mail to: [infosec@swagelok.com](mailto:infosec@swagelok.com)



Your selected Sales and Service Center:

**Swagelok Nederland**

+31 (0)88 9090 707

[info@swagelok.nl](mailto:info@swagelok.nl)

Coenecoop 192741 PG WaddinxveenThe Netherlands

[Website](#)

Website