

# Rubax Lifts Ltd

## Online Privacy Policy

Last updated May 2018

Thank you for visiting our website and your interest in our products and services. Rubax Lifts Ltd is a subsidiary of the Schindler Group and our company website is (one of) the Schindler Group websites (“**Sites**”) of Schindler Holding Ltd. and/or its affiliates (“**Schindler**”).

### 1. Introduction

At Rubax Lifts Ltd and at Schindler, we strive to honor the privacy and security of our users, customers and suppliers, as well as their representatives, in relation to all products, services, applications and websites provided by Schindler Holding Ltd. and any of its affiliates acting as a controller under relevant data protection rules and regulations. You can find a list and contact details of such Schindler controller entities on the following page: <https://www.schindler.com/schindler-in-europe>

### 2. Purpose of the Sites

#### **The Sites provide information about Rubax Lifts Ltd**

The Sites provide general information about Rubax Lifts Ltd, its products, solutions and services, career opportunities and information for investors.

Some of the Sites have special forms through which interested Site visitors can request further information about Rubax Lifts Ltd products and services.

Information about processing activities related to Rubax Lifts Ltd and Schindler’s recruiting portal are provided separately before registering. For further information please use the following link: <https://job.schindler.com/>.

### 3. Purpose of this Rubax Lifts Ltd Online Privacy Policy

#### **This Rubax Lifts Ltd Online Privacy Policy explains how we handle and treat your data when you visit the Sites**

Rubax Lifts Ltd and Schindler treats personal data in accordance with applicable data protection laws. To this end, we have issued this Rubax Lifts Ltd online privacy policy (“**Online Privacy Policy**”). It describes how we collect and further process personal data when you (i) register or visit the Sites, <http://www.rubax.co.uk/> or associated Sites or (ii) engage with us to use the services that Rubax Lifts Ltd provides on the Sites.

This Online Privacy Policy describes the type of personal data Rubax Lifts Ltd collects from users of the Sites, the method of collection and the purposes for which Rubax Lifts Ltd may use, share or disclose such personal data.

The term "personal data" in this Online Privacy Policy means any information that identifies, or could reasonably be used to identify any natural person.

This Online Privacy Policy is not necessarily a comprehensive description of our data processing. It is possible that other data protection statements (or General Terms and Conditions, Conditions of Participation or similar documents) are applicable to specific circumstances.

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### **If you provide us with personal data of other persons**

If you provide us with personal data of other persons (such as family members, work colleagues), it is your responsibility to ensure the respective persons are aware of this Data Protection Statement and only provide us with their data if you are allowed to do so and such personal data is correct.

### **Your acknowledgment of this Online Privacy Policy**

By using the Sites, you acknowledge that your personal data may be collected, used and disclosed in accordance with this Online Privacy Policy. **If you do not agree with this Online Privacy Policy, do not proceed to further use of the Sites.**

## **4. How to contact us**

If you have any questions or comments regarding this Online Privacy Policy, your personal data or data privacy at Rubax Lifts Ltd and at Schindler, please contact us at:

c/o Schindler Ltd, 205 Brooklands Road, Weybridge, Surrey, KT13 0BG  
Phone: +(44) ((0)1932) (758100)  
Email: [GDPR.gb@Schindler.com](mailto:GDPR.gb@Schindler.com)

## **5. How we collect and process Personal Data**

### **When, how and what kind of personal data we collect**

Rubax Lifts Ltd treats personal data in accordance with applicable data protection laws. We may collect your personal data in the course of our business, including through your use of our Sites.

Some of the Sites have special forms through which you can request further information about Rubax Lifts Ltd products and services. When you submit such a request or electronically pass information to Rubax Lifts Ltd in any way (e.g. via online contact form, e-mail, by filling in a customer survey or a feedback form, through participation in a competition, etc.) you may be asked to provide certain information, including, but not limited to, contact details e.g. your name, title, company, address, phone number, e-mail address or line of business.

### **We may collect data of your device and account**

You may also provide us with data regarding your device, your client or supplier account, etc. These kinds of data will in many circumstances be considered as personal data under applicable data protection legislation. If you choose to withhold any personal data requested by us, it may not be possible for you to gain access to or use certain parts, services or functions of the Sites and for us to respond to your query.

### **We may automatically log certain technical information**

By using our Sites, certain technical and other information is automatically disclosed by your computer to and logged by us (such as your network address, the type of your browser, the site that referred you to our site) for operational and security purposes, and to better understand the usage of our websites. Please see section 0 of this Online Privacy Policy "Cookies and Other Means of Identification".

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### 6. Purpose of Processing, Categories of Personal Data, Legal Grounds

Please consult the table below to see, when using our Sites, for which purposes we process (use, store, share, etc.) personal data, which categories of personal data are being processed as well as the legal grounds for such processing.

Purpose	Categories of Personal Data	Legal Grounds
<p><b>When you subscribe to a newsletter</b> The personal data we collect allows us to send you newsletters to keep you updated on our products and services.</p>	First and last name, company name, address, email address, phone number, information on the product or service you purchased or are interested in	We process your personal data based on your consent to receive our newsletters. The processing of your personal data is lawful as it is necessary to enable us to provide you with our newsletters. You can unsubscribe from this service at any time.
<p><b>When you submit a contact request</b> The personal data we collect allows us to process your specific request and our response thereto.</p>	Contact details and information on your contact request	The processing of your personal data is lawful as it is necessary to administer your request and to provide an appropriate response.
<p><b>When you submit a media enquiry</b> The personal data we collect allows us to process your media enquiry request and our response thereto.</p>	Contact details and information on your media enquiry	The processing of your personal data is lawful as it is necessary to administer your enquiry and to provide an appropriate response.
<p><b>When you create an account on our Sites</b> The personal data we collect and process allows us to create and operate an account for you on our Sites.</p>	First and last name, company name, address, email address, phone number as well as your assigned account number and your chosen password	The processing of your personal data is lawful as it is necessary to operate and maintain your account. You can close your account at any time.
<p><b>When you apply for a job</b> The personal data we collect allows us to process your job applications. For more information please consult the specific career Site link with a separate Privacy Policy <a href="https://job.schindler.com/">https://job.schindler.com/</a>.</p>	Contact details, your written application, CV and certificates/ diplomas	We process your personal data anticipating an employment contract. We do that on the basis of steps necessary for entering into a contract.
<p><b>When you call our call center in emergency situations</b> The personal data we collect allows us to communicate with you in emergency situations and to allocate a rescue service. We may record details of the communication to the extent permitted by applicable law.</p>	First and last name, location, phone number, contact details, other information to response to your call and to allocate a rescue service	We process your personal data to comply with safety legal requirements. The processing of your personal data is lawful as it is necessary to assess the emergency situation and to allocate a rescue service.

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<b>When you call our call center for general enquiries</b> The personal data we collect allows us to process your enquiry request and our response thereto.	First and last name, company name, address, email address, phone number, information on your enquiry and on the product or service related thereto	The processing of your personal data is lawful as it is necessary to administer your enquiry and to provide an appropriate response.
<b>When you participate in customer surveys</b> The personal data we collect allows us to receive your feedback on our products and services, to assess, analyse and improve our products and service and to train our employees.	First and last name, company name, address, email address, phone number, your feedback on our products or services.	The processing of your personal data is lawful as it is necessary to manage our relationship with you and to improve our products and services.

## 7. Automated decision-making including profiling

### We make no automated decisions and profiles

We do not intend to use the personal data we collect from you to make decisions based solely on automated processing. In addition, we do not intend to process your data automatically with the aim of evaluating certain personal aspects.

## 8. How long do we retain your Personal Data

### How long do we retain your personal data

Rubax Lifts Ltd takes every reasonable step to ensure that your personal data is only processed for the minimum period necessary for the purposes set out in this Online Privacy Policy. We process and retain your personal data as long as required

- for the purposes for which we collected it;
- for the performance of our contractual obligation, i.e. for the duration of the entire business or employment relationship (from the initiation, during the performance of the contract until it is terminated);
- for compliance with legal obligations or other purposes pursued with the processing, as well as beyond this duration in accordance with legal retention and documentation obligations.

Personal data may also be retained

- for the period during which claims can be asserted against Rubax Lifts Ltd or
- insofar as we are otherwise legally obliged to do so or
- if legitimate business interests require further retention (e.g., for evidence and documentation purposes).

As soon as your personal data are no longer required for the above-mentioned purposes, they will be deleted or anonymized, to the extent possible.

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### 9. Transfer of Personal Data to Other Parties (In-/Outside of the EEA)

#### **Who has access to your personal data**

We may, pursuant to valid legal process, such as a search warrant, subpoena, or court/governmental order, allow access to any information (including such categories of personal data) provided to Rubax Lifts Ltd, to comply with such process and to protect our rights and property. If warranted, we may also allow access to this information in special emergencies where physical safety is at risk.

Rubax Lifts Ltd moreover reserves the right to disclose any information obtained from or about you to third parties in connection with a merger, acquisition, bankruptcy or sale of all or substantially all of Rubax Lifts Ltd' assets.

#### **We share your personal data with other Schindler entities and third-parties outside of the Schindler group**

Your personal data may be transferred to other Schindler entities, as well as to any third parties to whom the relevant Schindler entity subcontracts all or part of this processing. This may for instance include e-marketing service providers, hosting providers, technical support and any other relevant roles.

They will process such personal data only for the purposes listed in this Online Privacy Policy and agree to treat it in accordance with it. They may only process your personal data in the same way as Rubax Lifts Ltd is permitted to process it.

#### **We may transfer your personal data outside of the European Economic Area (EEA)**

As Schindler is a global and worldwide acting group, your personal data may be transferred to countries with a different level of data protection than the country from where you have submitted the personal data. In the event of transfer of personal data to a country outside of the European Economic Area (EEA), Rubax Lifts Ltd systematically ensures the application of an adequate level of protection of such personal data by approved means (e.g. selecting "Privacy Shield"-certified processors or putting in place standard contractual clauses on the processing of personal data, in accordance with the EU Commission model clauses). You can request more information about such measures (including copies where relevant) by getting in touch with Rubax Lifts Ltd through the contact details below.

#### **We do not sell your personal data**

Except as otherwise set forth in this Online Privacy Policy or other data protection statements applicable in specific circumstances, we do not sell, trade, license or rent your personal data with any third parties outside of the Schindler group.

### 10. Your Rights

#### **How to access your personal data and to make use of your other rights**

Subject to applicable law, you may have some or all of the following rights in respect of your personal data. You can exercise these rights by submitting your request to [GDPR.gb@schindler.com](mailto:GDPR.gb@schindler.com)

You will need to include your personal details as well as some means of verifying your identity (e.g. copy of identity card or driving license). If the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected.

Please note that Rubax Lifts Ltd may reject requests that are excessive or a misuse of the relevant right.

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Please also note that some of these rights may be limited where Rubax Lifts Ltd has an overriding interest or legal obligation to continue to process your personal data.

### 1. Access right and data portability

You may have the right to obtain confirmation of whether Rubax Lifts Ltd processes personal data in relation to you and, if so, gain access to a copy thereof. If you require additional copies, we may need to charge a reasonable fee.

For certain kinds of data, you may also have a right to data portability.

### 2. Data accuracy: right of rectification and right to erasure

You may have the possibility to rectify or obtain the erasure of your personal data, provided that the applicable legal requirements are met. The right to erasure is subject to various exceptions, notably as regards personal data whose processing is necessary to support litigation or for compliance with statutory retention requirements.

### 3. Limits to processing: right to restriction and Right to object and consent withdrawal

You may have the right to object to the processing of your personal data and we will do so

- if we are relying on our own or someone else's legitimate interests to process your personal data, except
- if we can demonstrate compelling legal grounds for the processing of your personal data.

In relation to the processing of your personal data for direct marketing purposes, you may have the right to object at any time thereto.

Where any processing is based on consent, you may have the right to withdraw such consent at any time (without this affecting the processing prior to the consent withdrawal).

### 4. Right to lodge a complaint with the supervisory authorities

You may have the right to lodge a complaint with the supervisory authority, in particular the data protection authority that is competent for your place of residence or the lead supervisory authority for Rubax Lifts Ltd, namely:

The Information Commissioner's Office  
Water Lane, Wycliffe House, Wilmslow, Cheshire SK9 5AF. United Kingdom  
Tel. +44 1625 545 745  
e-mail: [international.team@ico.org.uk](mailto:international.team@ico.org.uk)  
Website: <https://ico.org.uk>

## 11. How we protect your Personal Data

### Security and confidentiality of your personal data

We are committed to keeping your personal data provided secure and we have implemented appropriate information security policies, rules and technical measures to protect your personal information that we have under our control from unauthorized access, improper use or disclosure, unauthorized modification and unlawful destruction or accidental loss.

All of our employees, partners, consultants, workers and data processors (i.e. those who process your personal data on our behalf, for the purposes listed above), who have access to, and are associated with the processing of your personal data, are obliged to respect the confidentiality of such data.

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### 12. Personal Data of Children

#### No collection of personal data from children

Rubax Lifts Ltd does not knowingly collect information from children. If Rubax Lifts Ltd learns that a child has provided it with personal data, it will use reasonable efforts to remove such information from its files.

### 13. Links to Other Websites

#### We may provide links to non-Schindler websites

This Online Privacy Policy applies only to the Sites, and not to websites owned by third parties. We may provide links to other websites which we believe may be of interest to you. However, due to the nature of the internet, we cannot guarantee the privacy standards of such websites or assume responsibility for the contents of websites other than the Rubax Lifts Ltd and Schindler Sites.

**This Online Privacy Policy is not intended to be applicable to any linked, non-Schindler website.** Whenever you open a link to other websites, you should exercise caution and read the privacy policies of the website in question.

### 14. Use of Social Media Plugins

#### How we use Social Bookmarks (e.g. Facebook, Twitter, Google+ or LinkedIn)

If you use Social Bookmarks you will be sending identifiable information to the respective social media platform. **Any comments or activity arising from persons using Social Bookmarks is not controlled or endorsed by Rubax Lifts Ltd or Schindler and Rubax Lifts Ltd or Schindler shall not be held responsible or liable for such.** Persons who share Rubax Lifts Ltd.'s content via Social Bookmarks are not authorized to speak for or represent Rubax Lifts Ltd. Their views and opinions must be strictly regarded as their own and not Rubax Lifts Ltd 's.

**This Online Privacy Policy is not intended to be applicable to any linked, non-Schindler website.** Whenever you open a link to other websites, you should exercise caution and read the privacy policies of the website in question.

The provisions in Rubax Lifts Ltd.'s Terms and Conditions and this Online Privacy Policy relating to links to other websites also apply to Social Bookmarks.

#### Third-party sites and social media platforms may collect your personal data

If you use Social Bookmarks you will be sending identifiable information to the respective social media platform. **Any comments or activity arising from persons using Social Bookmarks is not controlled or endorsed by Rubax Lifts Ltd or Schindler and Rubax Lifts Ltd or Schindler shall not be held responsible or liable for such.** Persons who share Rubax Lifts Ltd.'s content via Social Bookmarks are not authorized to speak for or represent Schindler. Their views and opinions must be strictly regarded as their own and not Rubax Lifts Ltd 's.

**This Online Privacy Policy is not intended to be applicable to any linked, non-Schindler website.** Whenever you open a link to other websites, you should exercise caution and read the privacy policies of the website in question.

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### 15. Cookies and Other Means of Identification

#### **What is a cookie**

A cookie is a small piece of data that a website stores on the visitor's computer or mobile device. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the website.

#### **Our use of cookies**

Our websites use cookies, pixel tags and other forms of identification and local storage (together referred to as "**Cookies**" hereunder) to distinguish you from other users of our website and of websites of our network. This helps us provide you with a good experience when you browse our website and websites of our network and also allows us to improve our websites and our services.

You can find out more information about the cookies that we use on our Sites by reading our **Cookie Policy** <http://www.rubax.co.uk/>

### 16. Changes to this Online Privacy Policy

We reserve the right, at our sole discretion, to change, modify, add, or remove portions from this Online Privacy Policy at any time. We shall notify any such changes in according with applicable data protection legislation.