

Fallbrook Technologies Inc. is a corporation incorporated under the laws of the state of Delaware. References in this policy to “we”, “us”, “enviolo”, or “Fallbrook” are references to Fallbrook Technologies Inc. and our affiliated entities, including Fallbrook Technologies International Co., a corporation incorporated in Nevada and having a registered branch in the Netherlands through which we sell and service our products in Europe.

Reference in this Policy to “personal data” means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information.

Fallbrook is committed to protecting and respecting your privacy.

Please read this Policy carefully to understand our practices with respect to personal data.

How we obtain your personal data

We regularly receive personal data as part of our business activities. We may collect your personal data:

- As part of our warranty service processing;
- When you participate in surveys or other marketing activities; and
- As part our ordinary course of dealings and business.

The personal data we collect and process

The personal information that we collect and process may include:

- Basic information, such as your name, age and gender;
- Contact information, such as your physical address, email address and phone number(s);
- Product information, such as your purchased product, the purchase date or other information about the product you purchased;
- Information you provide to us for the purposes of providing replacement parts or products; and
- Any other information relating to you which you may provide to us.

How we use your personal data

We will only use your personal data in connection with our ordinary business activities. These “Permitted Uses” may include:

- Providing warranty services to our customers;
- Occasional surveys for determining future product development information;
- Acting in compliance with any applicable regulatory or legal obligations, including with respect to anti-money laundering and anti-bribery;
- Processing that is necessary for purposes of the legitimate interest of the firm or third parties provided that such interests are not overridden by your interests or your fundamental rights and freedoms; and

- For any purpose related to the foregoing or for any purpose for which you provided the personal data to Fallbrook.

If you have given us your express consent, we may process your personal data for additional purposes. You may withdraw your consent at any time. Additional purposes for which we may process your personal data may include:

- Communicating with you with respect to product developments, announcements, events and Fallbrook products and services which may be of interest to you;
- Distributing surveys or marketing materials;
- Gathering information regarding your preferences to improve the quality of our communications and interaction with you, such as through website analytics or the tracking of our customer publications; and
- Any other purpose for which you have given consent.

How we share your personal data

Fallbrook is a global company and a list of our main offices, together with relevant contact information, may be found on our website. Irrespective of how we obtain your personal data, it may be shared among all the offices within Fallbrook (both inside and outside the European Economic Area). Our global policy requires all offices to at all times ensure a level of data protection at least as protective as those mandated by the European Economic Area. We may also need to transfer personal data to third parties, including third parties based outside the European Economic Area, for example (but not limited to) shippers and third parties involved in your matters.

Where we share or transfer your personal data, we will do this in accordance with applicable data protection laws and will take appropriate safeguards to ensure its integrity and protection.

Keeping your personal data secure

We will take appropriate technical and organizational measures against unauthorized or unlawful processing of your personal data and against accidental loss or destruction of, or damage to, your personal data in accordance with our internal security procedures covering its storage, access and destruction. Personal data may be stored on our own technology systems or those of our vendors or in paper files.

Retaining your personal data

We will delete your personal data when it is no longer reasonably required for the Permitted Uses or you withdraw your consent (where applicable), provided that we are not legally required or otherwise permitted to continue to hold such data. We may retain your personal data for an additional period to the extent deletion would require us to overwrite our automated disaster recovery backup systems or to the extent we deem it reasonably necessary to meet any regulatory requirement during any relevant retention period.

Your rights regarding your personal data

In addition to your rights under applicable data protection legislation and where we are permitted or required by applicable law and regulation, we will provide you, upon request, with a copy of your personal data and we will correct any errors identified by you. Except as set forth above, we will not use your data

for any automated decision making or any profiling and you have the right to restrict our processing of your personal data as well as the right to lodge a complaint with supervisory authorities regarding the processing of your personal data. We will refrain from sending you marketing materials without your express consent and will also comply with your request to stop sending any such further communications. All such requests, or any questions or comments regarding this policy or our handling of your personal data, should be addressed to privacy@enviolo.com.

Updates

This Privacy Policy was updated in May, 2018. We reserve the right to amend this Privacy Policy from time to time to reflect changing legal requirements or our processing practices. Any such changes will be posted on the website and will be effective upon posting.