



## TRIMAS CORPORATION WEBSITE FAIR PROCESSING NOTICE

DATE POSTED: May 24, 2018

### **WHAT IS THIS?**

**TriMas Corporation** takes privacy seriously and are committed to protecting it. This notice explains how TriMas Corporation and the affiliated companies (which means our subsidiaries, our ultimate holding company and its subsidiaries from time to time, as defined in section 1159 of the UK Companies Act 2006) ('we', 'our', 'us' as applicable), collects personal information about individuals, how this information is used, the conditions under which it may be disclosed to others and how it is kept secure.

### **WHO WE ARE**

The TriMas Corporation comprises of various individual companies. For a full list of these companies please visit our website at [www.trimascorp.com](http://www.trimascorp.com). Whenever dealing with our companies, the relevant company is the data controller in relation to the processing activities described below. A "*data controller*" is an organisation that decides why and how your personal information is processed.

### **PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT**

When you use our websites, our products or services, the categories of information that we may collect about you as follows:

#### **Personal Information you give to us:**

This is information about you that you provide to us voluntarily by:

- Use of our websites, including giving feedback through any of our blogs;
- Use of our mobile applications;
- Social media platforms;
- Corresponding with us by phone, email or otherwise,

This includes information provided at the time of registering to use our websites, subscribing to the services we provide through our websites, posting material or requesting further services, managing your account online (including accessing documentation and engaging in correspondence with us by phone, email or otherwise). We may also ask you for information when you report a problem with our websites. If you complete any surveys that we request you complete for research purposes, we will collect information in such circumstances as well. The information you give us includes your name, address, email address and phone number, enquiry details and may include records of any correspondence and responses to any surveys. Where you have applied for an employment opportunity with us through our Sites, the information you give us will also include the position you would like to apply for, the current company you work for and your current job title.

#### **Personal information we collect about you:**

We may automatically collect the following information: details of transactions you carry out through our websites, and your visits to our websites, including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources you access. We may also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. Please see [Cookie Notice](#) for further information. We may also collect any personal

information which you allow to be shared that is part of your public profile or third party social network, type and version, time zone setting, browser plug-in types and versions, operating system and platform.

## **HOW WE USE YOUR PERSONAL INFORMATION**

The purposes for which we use your information and the legal basis under data protection laws on which we rely to do this are explained below.

### **Where there is a LEGITIMATE INTEREST**

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business for the following purposes:

- for responding to requests for product design, development and support;
- for conducting customer and vendor commercial interactions like billing, collections, product shipments, receipts etc.;
- for marketing activities to our business contacts (other than where we rely on your consent to contact you by email or text with information about our products and services or share your details with third parties to do the same, as explained above);
- for analysis to inform our marketing strategy, and to enhance and personalise your customer experience (including to improve the recommendations we make to you on our websites);
- to correspond or communicate with you;
- to verify the accuracy of data that we hold about you and create a better understanding of you as a customer;
- for network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;
- for prevention of fraud and other criminal activities;
- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- to assess and improve our service to customers through recordings of any calls with our contact centres;
- for the management of queries, complaints, or claims; and
- for the establishment and defence of our legal rights.

### **Where you have provided CONSENT**

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- Where we do not already have another appropriate authorisation to undertake marketing to you (for example you are one of our business contacts) to contact you via email or text with marketing information about our goods and services if you (i) register for an account with us online and indicate that you would like to receive such marketing from us; (ii) sign up to our blog via our websites or other medium where available; or (iii) when you refresh your marketing preferences when responding to a request from us to do so.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

### **Where it is in your VITAL INTEREST**

Where we have supplied you with any products, we may use your personal information to contact you if there are any urgent safety or product recall notices to communicate to you or where we otherwise reasonably believe that the processing of your personal information will prevent or reduce any potential harm to you. It is in your **vital interests** for us to use your personal information in this way.

### **Where there is a LEGAL REQUIREMENT**

We will use your personal information to comply with our legal obligations: (i) to assist the Health and Safety Authority, or other public authority or criminal investigation body, or where we are required by another law to obtain and/or disclose personal data about you; (ii) to identify you when you contact us; or (iii) to verify the accuracy of data we hold about you.

### **Where it is required to complete a CONTRACT**

We may use and process your personal information where we have supplied you (or continue to supply you) with any products or services, where we have arranged for the supply of another company's products or services to you, or where you are in discussions with us about any new product or service. We will use this information in connection with the contract for the supply of products or services when it is needed to carry out that contract or for you to enter into it. Please see [Type of personal information we process](#) about you above for details of the types of personal information we process for these purposes.

## **DATA ANONYMISATION AND USE OF AGGREGATED INFORMATION**

Your information may be converted into statistical or aggregated data in such a way as to ensure that you are not identified or identifiable from it. Aggregated data cannot be linked back to you as a natural person. We may use this data for analytical and research purposes.

For more information on how we use cookies and how to switch them off on your device, please visit our [Cookie Notice](#).

## **OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION**

### **Group Companies**

We may share your information with other companies within the TriMas Corporation. They may use your personal information in the ways set out in [How we use your personal information](#), in connection with the products and/or services that complement our own range of products and/or services

Please see the start of this notice for the details of our companies with whom we may share your personal information.

## **Our suppliers and service providers**

We may disclose your information to our third party service providers, agents, subcontractors and other organisations for the purposes of providing services to us or directly to you on our behalf. Such third parties may include cloud service providers (such as hosting and email management), advertising agencies and administrative services.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

## **Customer satisfaction surveys**

As customer satisfaction is important to us, we may ask a third party research company to contact you for the sole purpose of gathering general information and specific information relating to us and our products and services.

## **Other ways we may share your personal information**

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we're under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

## **WHERE WE STORE YOUR PERSONAL INFORMATION**

All information you provide to us may be transferred to countries outside the European Economic Area (EEA). By way of example, this may happen where any of our companies are incorporated in a country outside of the EEA or if any of our servers or those of our third party service providers are from time to time located in a country outside of the EEA. These countries may not have similar data protection laws to the UK.

If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this notice. These steps include imposing contractual obligations on the recipient of your personal information or ensuring that the recipients are subscribed to 'international frameworks' that aim to ensure adequate protection. Please contact us using the details at the end of this notice for more information about the protections that we put in place and to obtain a copy of the relevant documents.

If you use our services whilst you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

## **HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We do not retain personal information in an identifiable format for longer than is necessary.

We may need your personal information to establish, bring or defend legal claims. For this purpose, we may retain your personal information for 7 years after the date it is no longer needed by us for any of the purposes listed under [How we use your personal information](#) above. The only exceptions to this are where:

- the law or our data retention policy requires us to hold your personal information for a longer period, or delete it sooner;
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further [Erasing your personal information or restricting its processing](#) below); or
- in limited cases, the law permits us to keep your personal information indefinitely provided we put certain protections in place.

## **SECURITY AND LINKS TO OTHER SITES**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our websites and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Where we collect any sensitive personal information about your ethnic background, sex life, political opinions, religion, trade union membership or criminal record, we will apply appropriate security controls to protect that data.

Where we have given (or where you have chosen) a password which enables you to access an account, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Our websites may contain links to other websites run by other organisations. This notice does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our websites from a third party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party website and recommend that you check the policy of that third party website.

## **COOKIES**

Like many other websites, our websites use cookies. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our [Cookie Notice](#).

## **MARKETING**

We may collect your preferences to receive marketing information directly from us by email, surveys or telephone in the following ways:

- by you providing us with your details, for example your business card at a trade fair when we inform you that is what the personal data will be used for;
- if you register an account with us online, we will ask you if you would like to provide your consent to receive marketing information directly from us;
- if you make a sales enquiry or place an order we may contact you with marketing information in the ways mentioned in the notices presented to you, except where you indicate you would prefer otherwise; or
- if you leave a comment on one of our blogs online, we will ask you if you would like to provide your consent to receive marketing information directly from us.

From time to time, we may ask you to refresh your marketing preferences by asking you to confirm that you wish to continue receiving marketing information from us.

You have the right to opt-out of our use of your personal information to provide marketing to you in any of the ways mentioned above. Please see [Withdrawing your Consent](#) and [Objecting to our use of your personal information and automated decisions made about you](#) below for further details on how you can do this.

## **YOUR RIGHTS**

You have a number of rights in relation to your personal information under data protection laws in the EU, though these are subject to exceptions. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either (i) the date that we have confirmed your identity or (ii) where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this notice.

- **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under [How we use your personal information](#), you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so using our unsubscribe tool. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- **Objecting to our use of your personal information and automated decisions made about you**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as outlined under [How we use your personal information](#), you may object to us using your personal information for these purposes by contacting us as described at the end of this notice. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data.

You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please use our unsubscribe tool.

You may also contest a decision made about you based on automated processing by contacting us as described at the end of this notice.

- **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by contacting us as described at the end of this notice. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request.

You may also ask us to restrict processing your personal information where you believe it is unlawful for us to do so, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations we may only process your personal information whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- **Transferring your personal information in a structured data file (data portability)**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under [How we use your personal information](#), you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Complaining to the relevant data protection regulator**

You have the right to complain to the Information Commissioner's Office (ICO) or other relevant data protection regulator if you are concerned about the way we have processed your personal information and we have not resolved your concerns. Please visit the [ICO's website](https://ico.org.uk/) (<https://ico.org.uk/>) for further details.

## **CHANGES**

We may make changes to this notice at any time by posting a copy of them on our website. Any changes will be effective based on the posting date of the notice. Your continued use of our Sites means that you agree to be bound by the modified policy.

## **CONTACT US**

If you have any questions or concerns about cookies or your privacy when using this website, please use the “Contact Us” section of our websites.

**SCHEDULE 1**  
**TriMas Corporation Companies**

<b>TriMas Corporation Group Company</b>	<b>Company Number (where available)</b>	<b>Registration Address</b>
Aerospace Finance Holdings LLC	5607673	38505 Woodward Avenue, Suite 200 Bloomfield Hills, MI 48304
Allfast Fastening Systems, LLC	201428910225	15200 Don Julian Road City of Industry, CA 91745, USA
Arrow Engine Company	0871321	2301 E. Independence Tulsa, OK 74110, USA
Basrur Uniseal Private Limited	U25209KA2001PTC029264	30A, Survey No. 63, Dobaspet I Phase, KIADB Ind. Area, Yedehalli, Sompura Hobli, Nelamangala, Bengaluru Rural Dist. Karnataka 562 111, India
CIFAL Participacoes Ltda.	CNPJ/MF No. 01.542.101/0001-57 NIRE No. 214.114.570	Alameda Santos, 905, cj. 102, parte, São Paulo CEP 01419-001
Global Aerospace Holdings SRL	1434	Chancery House High Street Bridgetown, BB11128, Barbados
Haining Rieke Packaging Systems Co., Ltd.		Workshop No. 2, No. 12 Zinxing Rd., Haining High-tech Industrial Zone, Haining, China
Lamons Belgium BVBA	0539.723.935	Lammerdries 18 G 2440 Geel, Belgium
Lamons Canada Limited	256071-2	835 Upper Canada Drive Sarnia N7W 1A3, Canada
Lamons Gasket and Bolt Ibérica S.L.	B-86245156	Avenida de Manoteras 10, Portal B, Loft 310 Madrid, Spain
Lamons Gasket and Bolt India Private Limited	U28113HR2011FTC043532	12/ 7, Mathura Road Faridabad, Haryana 121003, India
Lamons Gasket Company	0870365	7300 Airport Blvd. Houston, Texas 77061, USA
Lamons Gasket (Hangzhou) Co., Ltd.		B-4 Bldg, HEPZ Hangzhou Export Processing Zone, Hangzhou, China
Lamons Gasket (Zhangjiagang) Co., Ltd.		Chengang Road, #2, Jingang Town Zhangjiagang, Suzhou, China
Lamons Manufacturing UK Limited	09127510	44 Scudamore Road Leicester, England LE3 1UG, UK
Lamons Mexico Holdings B.V.	61373303	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Lamons Mexico, S. de R.L. de C.V.		REY015, Boulevard. Montebello, Lote 3, Manzana 2 Parque Industrial Colonial Reynosa, Tamaulipas 88780, Mexico

<b>TriMas Corporation Group Company</b>	<b>Company Number (where available)</b>	<b>Registration Address</b>
Lamons Nederland B.V.	24441502	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Lamons Singapore Pte. Ltd.		3 Tuas Avenue 10 Singapore 639127
Lamons (Thailand) Co., Ltd.	0105556062926	147/54 Mapya Road Map Ta Phut Muang Rayong, Rayong 21150 Thailand
Lamons UK Limited	7190836	Units 4 – 8 Pegasus Square, Innovation Way, Europarc, Grimsby, Lincolnshire, DN37 9TT
Mac Fasteners, Inc.	1705607	1110 E. Enterprise St. Ottawa, KS 66067, USA
Martinic Engineering, Inc.	C1437055	10932 Chestnut Ave., Stanton, CA 90680, USA
Monogram Aerospace Fasteners, Inc.	2272568	3423 S. Garfield Ave. Los Angeles, CA 90040, USA
Monogram Aerospace Fasteners India Private Limited	U28113TN2011FTC080647	Flat No: 03 No: 100 Swami Naiken Street Chintadripet Chennai TN 600002, India
Norris Cylinder Company	2179167	4818 W. Loop 281 Longview, TX 75603, USA
Norris Tooling LLC	5873695	4818 W. Loop 281 Longview, TX 75603, USA
RLB C.V.		WC Rotterdam, Postbus 4030 3006 AA Rotterdam, Netherlands
Rieke Canada Holdings B.V.	851849593	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Rieke Canada ULC	3265416	125 Orenda Rd. Brampton, Ontario L6W 1W3 Canada
Rieke Corporation	197802-300	500 W. Seventh St. Auburn, IN 46706
Rieke de Mexico, S. de R.L. de C.V.		Saturno 22, Nueva Industrial Vallejo Mexico City D.F., 07700, Mexico
Rieke de México Manufacturing, S. de R.L. de C.V.		Circuito Corral de Piedras M-1 L-16, Polígono Empresarial San Miguel, Mun. San Miguel Allene Estado de Guanajuato 37888, MX
Rieke Global Innovation Center India Private Limited	U74999DL2015FTC277366	Express Trade Tower II, Tower 4, 6th Floor, B-36, Sector 132, Noida, 201304 UP, India
Rieke Italia S.r.L.	LC - 0290036	Via Lecco II Valmadrera Le 23868, Italy
Rieke-Lamons Brazil Holdings Coöperatief W.A.	851836434	Max Euwelaan 35 Rotterdam 3062MA, Netherlands

<b>TriMas Corporation Group Company</b>	<b>Company Number (where available)</b>	<b>Registration Address</b>
Rieke-Lamons General Brazil Holdings LLC	5179042	38505 Woodward Avenue, Suite 200 Bloomfield Hills, MI 48304
Rieke-Lamons Germany Holdings GmbH	HRB 90425/Local Court of Frankfurt	In der Au 13, D-52790 Neunkirchen, Siegerland, Germany
Rieke Germany GmbH & Co. KG	HRA 8814/Local Court of Siegen	In der Au 13, D-52790 Neunkirchen, Siegerland, Germany
Rieke-Lamons International Holdings LLC	4698283	38505 Woodward Ave., Suite 200 Bloomfield Hills, MI 48304
Rieke-Lamons Limited Brazil Holdings LLC	5179044	38505 Woodward Ave., Suite 200 Bloomfield Hills, MI 48304
Rieke-Lamons Nederland Holdings B.V.	34347795	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Rieke-Lamons UK Holdings B.V.	54065135	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Rieke Mexico Holdings B.V.	65487249	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
Rieke Packaging India Private Limited	U51103DL1991PTC192399	Khasra No. 371 & 378, Dasomajra, Bhut Tehsil, P. O. Badd Dist Solan, Himachal Pradesh, IN
Rieke Packaging Systems (Hangzhou) Co., Ltd.		Hangzhou Export Processing Zone, Bldg. No. 6, Zhejiang Province Hangzhou 310018, China
Rieke Packaging Systems Australia Pty. Ltd.	093 274 563	Level 22 MLC Centre 19 Martin Place Sydney 2000, New South Wales
Rieke Packaging Systems Limited	00291835	44 Scudamore Road, Leicester, England LE3 1UG, UK
Rieke Packaging Vietnam Company Limited		Manufacturing Rezoned Area at Binh Duong Industrial Svc & Urban Complex, HoaPhu Ward Thu Dau, Binh Duong Province
Rieke Trading (Hangzhou) Co. Ltd.		Room 1907, Block 1, Yangguangxicheng, HEDA Zhejiang Province, Hangzhou, China
TriMas Company LLC	3523379	38505 Woodward Avenue, Suite 200 Bloomfield Hills, MI 48304
TriMas Corporation	2092495	38505 Woodward Avenue, Suite 200 Bloomfield Hills, MI 48304
TriMas Corporation Limited	03226735	44 Scudamore Rd. Leicester, United Kingdom LE3 1UG
TriMas Hong Kong Holdings Limited	1350444	1106-8, 11/F Tai Yau Building 118 Johnston Road Wanchai, Hong Kong
TriMas Nederland Holdings B.V.	34347785	Max Euwelaan 35 Rotterdam 3062MA, Netherlands
TriMas UK Aerospace Holdings Limited	09166973	44 Scudamore Rd. Leicester, United Kingdom LE3 1UG

<b>TriMas Corporation Group Company</b>	<b>Company Number (where available)</b>	<b>Registration Address</b>
YuYao Crystal Shine Plastic Products Trading Co., Ltd.		No. 398, Unit 1702 Zhongmo International Building South Nanlei Road Yuyao City 315400, China