

PRIVACY POLICY

The controller of this website is [●]. This website is for information purposes only, and no personal data are collected herein. If personal data are requested on a microsite of this website for a specific purpose and/or service, the data subject shall also be informed about all elements required by the applicable data protection regulations when the data are collected.

Data Controller Identity: [●]

Register address: [●]

Data Protection Officer's Contact details: [●]

1. Scope

This Privacy Policy applies to information, including personal information, collected and used by [●] and its affiliated companies and subsidiaries (hereinafter "FOX"). This Privacy Policy applies to information we collect on our websites and in email, text, and other electronic messages between you and FOX. It does not apply to information collected by us offline or through any other means, including on any other website operated by a third-party, or collected by us or any of our affiliates or subsidiaries related to your or any other individual's employment or potential employment, or collected by any other third-party, including through any application or content (including advertising) that may link to or be accessible from our websites.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to use our websites. By accessing or using our websites, you agree to this Privacy Policy; however, if you are based in the EU, when you use our website or interact with us electronically as described herein, you may need to authorize FOX to process your personal data within the scope of this Privacy Policy. This Privacy Policy may change from time to time (see Changes to this Policy). Unless otherwise required by mandatory laws, your continued use of our websites after we make changes is deemed to be acceptance of those changes, so please check this Privacy Policy periodically for updates.

2. Data Controller, Data Protection Officer, and Representative

FOX is the data controller of your personal data. FOX has appointed a Data Protection Officer and a representative in the European Union in compliance with the General Data Protection Regulation. FOX, its Data Protection Officer, or its representative may be contacted in any manner set forth below in section 14 of this privacy notice.

3. Information collected by FOX

FOX collect data and information about you such as name, surname, company, contact details, email, postcode, fax number, your request data, and any other data you provide us and/or that will be needed to install our business relationship. We also collect information that is about you but does not directly identify you, such as your IP address, browser type and version, operating system, traffic data, location data, logs, referring/exit pages, date and time of your visit to our websites, error information, clickstream data, other communication data, the resources that you access and use on the websites, and other information about your internet connection and the equipment you use to access our websites.

FOX collects data from a variety of sources, including:

- a) Information we collect from you directly via email, phone, letter, fax and any other means;
- b) Information we collect about you when you call us, visit our sites, use our mobile applications or services, or view our online advertisements;
- c) Information we collect about you from other sources, such as commercially available sources;

- d) Information we collect automatically as you navigate the website through cookies, web beacons, and other tracking technologies.

The personal data we collect from you is required to identify your technical service requirements, confirm the products and services suitable for you, enter into a contract with FOX, for FOX to perform under the contract, and to provide you with our products and services and the information you request. If you refuse to provide such personal data or withdraw your consent to our processing of personal data (when appropriate), then in some cases we may not be able to enter into the contract or fulfill our obligations to you under it.

4. Use of data

All the information FOX collects about you may be combined to improve our communications with you and to develop world-class products and services. FOX will use the information collected to:

- a) provide the products and services you request (newsletter, guarantee on products, quotations, offers etc.);
- b) evaluate our potential or existing commercial relationship and your ability to perform the contract based on our legitimate interest to do so;
- c) subject to below, conduct marketing and sales activities (including generating leads, pursuing marketing prospects, performing market research, determining and managing the effectiveness of our advertising and marketing campaigns and managing our brand);
- d) operate, evaluate and improve our business (such as by administering, enhancing and improving our products and services; developing new products and services; managing our communications and customer relationships; performing accounting, auditing, billing, reconciliation and collection activities);
- e) to carry out our obligations and enforce our rights arising from any contracts entered into between you and us;
- f) to notify you about changes to our websites or any products or services we offer;
- g) maintain and enhance the safety and security of our products, services, network services, information resources and employees;
- h) in any other way we may describe to you when you provide the information;
- i) for any other purpose for which you provide it or with your consent.

Where required by applicable law, FOX will obtain your consent for the processing of your personal information for direct marketing purposes.

The legal basis for FOX processing your personal information as described above will typically be one of the following:

- i. **Your consent.** By using our website or, under applicable laws, where you are offered the option to consent, selecting the relevant tick box, you consent to our collection, use, and sharing of your personal data for the purposes of conduct marketing and sales activities as described in this Privacy Policy. You can opt-out at any time, free of charge and without prejudice to the lawfulness of processing based on consent given before revocation, as set forth below in section 7 of this privacy notice.
- ii. **Performance of a contract with you or where you are a relevant party.** We process your personal data in order to fulfill our obligations to you pursuant to our contract with you or with you as a relevant party and to deliver our goods and services to you;

- iii. **Our legitimate business interests.** Our legitimate interests are balanced against your interests and rights and freedoms and we do not process your personal data based on our interests if your interests or rights and freedoms outweigh our legitimate interests. Our legitimate interests are to: facilitate communication between FOX and you; detect and correct bugs and to improve our websites; safeguard our IT infrastructure and intellectual property; detect and prevent crime; promote and market our business (provided that in certain jurisdictions this may apply solely to services similar to those you have purchased from us) and to develop our products and services; or
- iv. **Compliance with our legal obligation.** We may also process your Personal Data when we are required or permitted to by law; to comply with government inspections, audits, and other valid requests from government or other public authorities; to respond to legal process such as subpoenas; or as necessary for us to protect our interests or otherwise pursue our legal rights and remedies (for instance, when necessary to prevent or detect fraud, attacks against our network, or other criminal and tortious activities), defend litigation, and manage complaints or claims.

If you have an account with us, we will retain your personal data for the entire time that you keep your account open. Otherwise, or after you close your account, data will be retained by FOX only for a period as it may be considered necessary according to applicable laws and reasonable business practices. This may also include keeping your personal data on our backup and disaster recovery systems in accordance with our backup and disaster recovery policies and procedures. For data that have been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, we may keep such information indefinitely.

5. Disclosure of Data to Third Parties

FOX does not sell your information for monetary consideration or otherwise disclose personal information about you except as described here or at the time of collection.

FOX may share personal information within the FOX Group for the purposes described in this Privacy Policy.

FOX may share personal information with service providers FOX has retained to perform services on our behalf (such as payment processing, order fulfillment, customer support and data analytics). These service providers are contractually required to safeguard the information provided to them under terms substantially equivalent to those of this Privacy Policy and are restricted from using or disclosing such information except as necessary to perform services on our behalf or to comply with legal requirements.

FOX may share personal information with our joint marketing partners and other business partners for the purposes described in this Privacy Policy, and if you agree to share the data with them.

FOX may share personal information about you to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by FOX about our customers is among the assets transferred.

** FOX may also disclose personal information about you (1) if we are required or permitted to do so by applicable law or legal process (such as a court order), (2) to law enforcement authorities or other government officials to comply with a legitimate legal request, (3) when we believe disclosure is necessary or appropriate to protect the rights, property, or safety of a member of the FOX Group, our customers, or others, (4) to establish, exercise or defend our legal rights, (5) in connection with an investigation of suspected or actual fraud or illegal activity, (6) to fulfil the purpose for which you provided it, (7) for any other purpose disclosed by us when you provided the information, or (8) otherwise with your consent.*

6. Data Transfers

FOX may transfer the personal information FOX collects and store such data in other countries, including China, [please insert other countries FOX is operating in] which may have different data protection laws than the country in which the information was provided. If we do so, we will transfer the personal information only for the purposes described in this Privacy Policy. To the extent required by applicable law, when we transfer your personal information to recipients in other countries, we will take adequate measures to protect that information. Where required by law, we use data protection agreements between FOX and all other recipients of your data that include, where applicable, the Standard Contractual Clauses adopted by the European Commission as providing an adequate level of protection for personal data. When applicable, under these Standard Contractual Clauses you have the same rights as if your data was not transferred to a third country. You may request a copy of the applicable data protection agreement by contacting us through the contact information below.

7. Your rights

Applicable data protection laws may provide you with certain rights with regards to our processing of your Personal Data. These may include:

Access, Update and Rectification. You can review and change your personal data by contacting us through the Contact Information below of any changes or errors in any personal data we have about you to ensure that it is complete, accurate, and as current as possible. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.

Restrictions. You have the right to restrict our processing of your personal data under certain circumstances. In particular, you can request we restrict our use of it if you contest its accuracy, if the processing of your personal data is determined to be unlawful, or if we no longer need your personal data for processing but we have retained it as permitted by law.

Portability. To the extent the personal data you provide FOX is processed based on your consent and that we process it through automated means, you have the right to request that we provide you a copy of, or access to, all or part of such personal data in structured, commonly used and machine-readable format. You also have the right to request that we transmit this personal data to another controller, when technically feasible.

Withdrawal of Consent. Solely to the extent that our processing of your personal data is based on your consent, you may withdraw your consent at any time by closing your account. Withdrawing your consent will not, however, affect the lawfulness of the processing based on your consent before its withdrawal, and will not affect the lawfulness of our continued processing that is based on any other lawful basis for processing your personal data.

Right to be Forgotten. You have the right to request that we delete all of your personal data. If you have an account, we cannot delete your personal data except by also deleting your user account, and we will only delete your account when we no longer have a lawful basis for processing your personal data or after a final determination that your personal data was unlawfully processed. We may not accommodate a request to erase information if we believe the deletion would violate any law or legal requirement or cause the information to be incorrect. In all other cases, we will retain your personal data as set forth in this policy. In addition, we cannot completely delete your personal data as some data may rest in previous backups. These will be retained for the periods set forth in our disaster recovery policies.

Complaints. You have the right to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data protection laws have been violated. However, before doing so, we invite you to contact us directly in order to give us an opportunity to work directly with you to resolve any concerns about your privacy.

How You May Exercise Your Rights. You may exercise any of the above rights by contacting us through any of the methods listed under Contact Information below. If you contact us to exercise any of the foregoing rights, we may ask you for additional information to verify your identity. We reserve the right to limit or deny your request if you have failed to provide sufficient information to verify your identity or to satisfy our legal and business requirements. Please note that if you make unfounded, repetitive, or excessive requests (as determined in our reasonable discretion) to access your personal data, you may be charged a fee subject to a maximum set by applicable law.

The state or other jurisdiction you live in may provide you with additional rights regarding our use of personal data, including the right to receive additional information about our collection and use of your personal data. To learn more about any additional rights or to receive any additional information that may be applicable to you as a resident of one of these states or jurisdictions, please see the privacy addendum for your state or jurisdiction that is listed below and is attached to this Privacy Policy.

8. Links to Third-Party Sites and Social Media

FOX sites may include links to third-party sites. FOX does not control these third-party sites, and we encourage you to read the privacy policy of every site you visit.

FOX sites may also have “plugins” (such as the Facebook “Like” button) to third-party sites or offer login (such as log in with Facebook) through a third-party account. Third-party plugins and login features, including their loading, operation and use, are governed by the privacy policy and terms of the third-party providing them.

9. Changes to this Policy

We may change this Privacy Policy at any time. It is our policy to post any changes we make to this Privacy Policy on this page. Please check this privacy policy periodically to inform yourself of any change. If we make any material changes to how we treat our users’ personal data, we will notify you via email to the email address specified in your account (if you have one) and/or through a notice on the websites’ home page. The date this privacy policy was last revised is identified at the top of this page. You are responsible for ensuring we have an up-to-date active and deliverable email address (if you have an account) and for periodically visiting our websites and this Privacy Policy to check for changes. In case of significant changes to this Privacy Policy, we will provide you a notification by email.

10. Cookies, domain names and web beacons

FOX’s website server automatically records “Visitor Information” based on your activity on the Website, through the use of “IP addresses” (as described below) or “Cookies” (as described below) or other industry-standard techniques, such as domain names or web beacons. FOX may use Visitor Information, including user behaviour, user experience, user equipment and the computing and Internet environment, to improve the performance of the Website. Unless otherwise permitted in your jurisdiction, we only place cookies on your device with your consent. You may withdraw or change your consent at any time by clicking “cookies” on our homepage and adjusting your cookie settings. You may also refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our website.

11. Do Not Track Signals

We do not track you over time and across third-party websites or other online services for any purpose. Some web browsers permit you to broadcast a signal to websites and online services indicating a preference that they “do not track” your online activities. Because we do not track your online activities, we do not honor such signals and we do not modify what information we collect or how we use that information based upon whether such signal is broadcast or received.

12. FOX Protection of Information

FOX has implemented security measures designed to protect all Information collected from unauthorized access, maintaining data accuracy and enabling the correct use of Information. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our websites. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures used on the websites.

13. Commercial information and minors

Our websites are intended to provide commercial information and to collect data only from commercial operators and it is not intended to be used by minors under 18 years of age. No one under age 18 may provide any information to or on the websites. If you are under 18, do not use or provide any information on our websites or on or through any of its features. If we learn we have collected or received personal data from a child under 18 without verification of parental consent, we will delete that information.

14. Accessing your data and Privacy Complaint

If you have any questions, concerns, complaints, or suggestions about this Privacy Policy, the practices of this Website, or if you want to exercise any of the rights that you are given under this Privacy Policy or under European General Data Protection Regulation, you may contact us by sending a letter or email to us and our representative in the European Union at the contact information below:

Data Controller Identity: [●]

Register address: [●]

Data Protection Officer's Contact details: [●]