

# Data privacy statement

## A. Information regarding the collection of personal data

(1) In the following, we provide information regarding the collection of personal data when using our website. Personal data is defined as all data that relates to you personally, e.g. name, address, e-mail addresses, user behavior.

(2) Controller in accordance with article 4(7) of the EU General Data Protection Regulation (GDPR) is

dormakaba USA Inc.  
6161 E. 75th Street  
Indianapolis, IN 46250

dormakaba USA Inc.  
1 Dorma Drive, AC Drawer  
Reamstown, PA 17567

dormakaba Canada Inc.  
7301 Decarie blvd.  
Montreal, QC Canada  
H4P 2G7

dormakaba Mexico, S. de R.L de C.V.  
Sur 110, No. 63, Tolteca  
CDMX, Mexico, 01150

Alvarado Manufacturing  
12660 Colony St.  
Chino, CA 91710

Our data protection officer can be contacted at [data.protection@dormakaba.com](mailto:data.protection@dormakaba.com) or using our postal address and adding "The data protection officer".

(3) When contacting us by e-mail or using a contact form, the data you supply (your e-mail address, your name and phone number if necessary) are stored by us in order to answer your questions. We delete the data gathered in this regard once storage of such data is no longer required, or limit processing of such data should statutory storage obligations apply.

(4) Should we require contracted providers to carry out individual functions of our offering or should we like to use your data for commercial purposes, we shall inform you in detail of the respective actions. In doing so, we shall also inform you of the defined criteria regarding duration of storage.

## B. Your rights

You have the following rights vis-à-vis ourselves with regard to your personal data:

- Right of access
- Right to rectification or erasure
- Right to limitation of processing
- Right to object to processing
- Right to data portability.
- Right to lodge a complaint with a regulatory authority.

## C. Collection of personal data when visiting our website

(1) When using our website for purely informational purposes, i.e. without registering or otherwise submitting information to us, we only collect the personal data that your browser transmits to our server. If you would like to view our website, we collect the following data that we require from a technical point of view to display our website to you and guarantee stability and security (the legal basis here is article 6(1) sentence 1, lit. f GDPR):

- IP address
- Date and time of enquiry
- Time zone difference to Greenwich Mean Time (GMT)
- Content of request (specific page)
- Access status/HTTP status code
- Volume of data transmitted
- Website from which the request originated
- Browser

- Operating system and its interface
- Language and version of browser software.

(2) In addition to the aforementioned data, when using our website, cookies will be stored on your computer. Cookies are small text files stored on your hard drive by the web browser you are using, enabling certain information to be collected by the website owner who sets the cookie (in this case us). Cookies cannot execute programs or transmit viruses onto your computer. They are designed to make the internet service as a whole more user-friendly and effective.

(3) Use of cookies:

a) This website uses the following types of cookies, the scope and functioning of which shall be described below:

- Transient cookies (b)
- Persistent cookies (c).

b) Transient cookies are automatically deleted when you close the browser. These include session cookies in particular. They store a so-called session ID with which the various requests from your browser are assigned to the session as a whole. This means your computer can be recognized when you return to our website. The session cookies are deleted when you log out or close the browser.

c) Persistent cookies are deleted automatically after a specified length of time, which may differ depending on the cookie. You can delete the cookies at any time in your browser's security settings.

d) You can configure your browser settings according to your needs and decline acceptance of third-party cookies or all cookies, for example. We advise you that you may not be able to use all functions of this website.

e) The Flash cookies used are not collected by your browser but by your Flash Plug-in. We also use HTML5 storage objects, which are stored on your terminal. These objects store the data required independently of your browser used and have no automatic expiry date. If you do not want Flash cookies to be processed, you have to install a corresponding add-on. The use of HTML5 storage objects may impede you as they use private mode in your browser. We also recommend manually deleting your cookies and browser history regularly.

f) This website uses Google Analytics, a web analysis service of Google Inc. ("Google").

#### D. Google Analytics

(1) Google Analytics uses so-called "cookies", text files that are stored on your computer and enable analyses to be carried out regarding your use of the website. The information generated by the cookie about your use of this website is generally transmitted to a server of Google in the USA and stored there. In the event that IP anonymization is activated on this website, your IP address will be shortened in advance by Google, however, within Member States of the European Union or in other Contracting States to the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to a server of Google in the USA and shortened there. On behalf of the operator of this website, Google shall use this information to analyze your use of the website to compile reports on website activity and perform further services associated with website usage and internet usage for the website operator.

(2) You can prevent cookies being stored by selecting the corresponding setting in your browser software; we advise, however, that you may not be able to use the functionality of this website to its fullest extent in this case. You may also prevent the gathering of data generated by the cookie relating to your use of the website (including your IP address) by Google as well as the processing of this data by Google by downloading and installing the browser plug-in available at the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

(3) This website uses Google Analytics with the extension "\_anonymizeIp()". Here, IP addresses are further processed in shortened form meaning individual identification of the user is not possible. Should the data gathered about you enable identification, this will be immediately precluded and the personal data immediately deleted.

(4) We use Google Analytics to analyze and regularly improve use of our website. Using the statistics obtained, we can improve our offering and make it more interesting for you as a user. For exceptional cases in which personal data is transmitted to the USA, Google is subject to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>. The legal basis for use of Google Analytics is article 6(1) sentence 1, lit. f GDPR.

(5) Third-party provider information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001. User

conditions: <https://www.google.com/analytics/terms/us.html>, overview of data

protection: <https://support.google.com/analytics/answer/6004245?hl=en>, and data privacy

statement: <https://policies.google.com/privacy?hl=en&gl=en>.

#### E. Privacy statement for dormakaba newsletter

(1) With your consent you may subscribe to our newsletter in which we inform you about our current offers that may be of interest. The advertised goods and services are mentioned in the declaration of consent.

(2) We use the double opt-in procedure when you register for our newsletter. This means that after your registration we send you an e-mail to the e-mail address you provided in which we ask you for confirmation that you would like to receive the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and then deleted automatically after one month. We also store your IP addresses and the times of your registration and confirmation. The purpose of this procedure is to verify your registration and to discover any possible misuse of your personal data.

(3) The only mandatory information required to send the newsletter is your e-mail address. Provision of further data shown separately is voluntary and is used to address you personally. After your confirmation we store your e-mail address in order to send a newsletter. The legal basis is Art. 6 (1) s. 1 a GDPR.

(4) You may revoke your consent at any time and unsubscribe from the newsletter. You may revoke your consent by clicking on the link provided in every newsletter or by using the above contact details to send a message.

(5) We draw your attention to the fact that we evaluate your user behavior when the newsletter is sent. For this evaluation, the e-mails sent contain so-called web beacons or tracking pixels which represent single-pixel image files stored on our website. For these evaluations we link the data mentioned in (3) and the web beacons to your e-mail address and an individual ID.

Links in the newsletter also contain this ID. We use the data obtained in this way to create a user profile to tailor the newsletter to your individual interests. In this process we make a record of when you read our newsletters, which links in them you click on, and then draw conclusions about your personal interests. We link this data with your actions on our website.

You may object to tracking at any time by clicking on the separate link provided in every e-mail or by informing us via any other communication channel. The information will be stored as long as you subscribe to the newsletter. After you unsubscribe, we will only store the data in a statistical and anonymous form.

Furthermore, such tracking is not possible if you have disabled the display of images in the default settings in your e-mail application. In this case the newsletter will not be fully displayed and you may not be able to use all the functions. If you choose to display the images manually, the above-mentioned tracking will take place.